U.S. DEPARTMENT OF COMMERCE
National Technical Information Service

PB-297 917

Ambient Water Quality Criteria: Asbestos

(U.S.) Environmental Protection Agency, Washington, DC

1978

PB-297 917

ASBESTOS

Ambient Water Quality Criteria

Criteria and Standards Division
Office of Water Planning and Standards
U.S. Environmental Protection Agency
Washington, D.C.

REPRODUCED BY
NATIONAL TECHNICAL
INFORMATION SERVICE
U. S. DEPARTMENT OF COMMERCE
SPRINGFIELD, VA. 22161

BIBLIOGRAPHIC INFORMATION

PB-297 917

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PERFORMER: Environmental Protection Agency, Washington, DC.
Criteria and Standards Div.

Section 304(a) of the Clean Water Act (33 U.S.C. 1314(a)), requires EPA to publish and periodically update water quality criteria. These criteria are to reflect the latest scientific knowledge on the identifiable effects of pollutants on public health and welfare, aquatic life, and recreation. This report presents water quality criteria for asbestos. It presents concentration criteria for the protection of fresh water and saltwater aquatic life. It presents 'safe' concentrations for humans, and in the case of suspect or proven carcinogens, gives various levels of incremental cancer risk. A section 304(a) water quality criterion is a qualitative or quantitative estimate of the concentration of a water constituent or pollutant in ambient waters which, when not exceeded, will ensure a water quality sufficient to protect a specified water use. Under the Act a criterion is a scientific entity, based solely on data and scientific judgment. It does not reflect considerations of economic or technological feasibility nor is it a water quality standard and in itself has no, ...

KEYWORDS: *Water quality, *Toxicology, *Asbestos, *Toxic substances, *Water pollution effects(Humans).

Available from the National Technical Information Service, Springfield, Va. 22161

PRICE CODE: PC A08/MF A01

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CRITERION DOCUMENT

ASBESTOS

CRITERIA

Aquatic Life

For freshwater aquatic life, no criterion for asbestos can be derived using the Guidelines, and there are insufficient data to estimate a criterion using other procedures.

For saltwater aquatic life, no criterion for asbestos can be derived using the Guidelines, and there are insufficient data to estimate a criterion using other procedures.

Human Health

For the maximum protection of human health from the potential carcinogenic effects of exposure to asbestos through ingestion of water and contaminated aquatic organisms, the ambient water concentration is zero. Concentrations of asbestos estimated to result in additional lifetime cancer risk of 1 in 100,000 are presented in the Criterion Formulation section of this document. The Agency is considering setting criteria at an interim target risk level in the range of 10^{-5}, 10^{-6}, or 10^{-7} with corresponding criteria of 300,000 fibers/l, 30,000 fibers/l, and 3,000 fibers/l, respectively.

Introduction

Asbestos is a broad term applied to numerous fibrous mineral silicates composed of silicon, oxygen, hydrogen, and metal cations such as sodium, magnesium, calcium, or iron. There are two major groups of asbestos, serpentine (chrysotile) and amphibole. Chrysotile is the major type of asbestos used in the manufacture of asbestos products. These products include asbestos cement pipe, flooring products, paper products (e.g. padding), friction materials (e.g. brake linings and clutch facings), roofing products, and coating and patching compounds. In 1975, the total consumption of asbestos in the U.S. was 550,900 thousand metric tons.

Of the 243,527 metric tons of asbestos discharged to the environment, 98.3 percent was discharged to land, 1.5 percent to air, and 0.2 percent to water. Solid waste disposal by consumers was the single largest contribution to total discharges. Although no process water is used in dry mining of asbestos ore, there is the potential for runoff from asbestos waste tailings, wet mining, and iron ore mining. Mining operations can also contribute substantially to asbestos concentrations in water via air and solid waste contamination. In addition to mining and industrial discharges of asbestos, asbestos fibers, which are believed to be the result of rock outcroppings, are found in rivers and streams.

The chemical composition of different asbestos fibers varies widely and typical formulas are presented in Table 1 (U.S. EPA, 1976). It should be noted that the values obtained from actual chemical analysis of the various fibers also may differ slightly from the typical formulas. Although chrysotile is considered to be a distinct mineral, the five amphibole minerals are each varieties of other minerals (Zoltai and Stout, 1976). These minerals differ from each other both chemically and physically with the exception that they all contain silicon and all form fibers when crushed. Good quality asbestos will form fibers with higher ratios of length to width than poorer grades.

TABLE 1

Typical Formulas for Asbestos Fibers

1. Serpentines	chrysotile	$Mg_3Si_2O_5(OH)_4$
2. Amphiboles	amosite	$(Mg,Fe)_7Si_8O_{22}(OH)_2$
	crocidolite	$Na/_2(Mg,Fe)_5Si_8O_{22}(OH)_2$
	anthophyllite	$(Mg,Fe)_7Si_8O_{22}(OH)_2$
	tremolite	$Ca_2Mg_5Si_8O_{22}(OH)_2$
	actinolite	$Ca_2(Mg,Fe)_5Si_8O_{22}(OH)_2$

The basic crystal form of the amphibole minerals is less complicated than for chrysotile. The basic structure consists of a double silica chain (Si_4O_{11}) that is paired back-to-back with a layer of hydrated cations between the chains (Speil and Leineweber, 1969).

Some typical physical properties of three different mineral forms are presented in Table 2 (Gaze, 1965).

TABLE 2

Typical physical properties of chrysotile (white asbestos), crocidolite (blue asbestos), and amosite

	Units	Chrysotile (white asbestos)	Crocidolite	Amosite (blue asbestos)
Approximate diameter of smallest fibers	micron	0.01	0.08	0.1
Specific gravity	-	2.55	3.37	3.45
Average tensile strength	lb./inch^2	3.5×10^5	5×10^5	1.75×10^5
Modulus of elasticity	lb./inch^2	23.5×10^6	27.0×10^6	23.5×10^6

Asbestos minerals, despite a relatively high fusion temperature, are completely decomposed at temperatures of 1,000°C. Both the dehydroxylation temperature and decomposition temperature increase with increased MgO content among the various amphibole species (Speil and Leineweber, 1969).

The solubility product constants for various chrysotile fibers range from 1.0×10^{-11} to 3×10^{-12}. Most materials have a negative surface charge in aqueous systems. However, since chrysotile has a positive (+) charge, it will attract, or be attracted to, most dispersed materials. The highly reactive surface of asbestos causes many surface reactions which are intermediate between simple absorption and a true chemical reaction. The absorption of various materials on the surface of chrysotile supports the promise that the polar surface of chrysotile has a greater affinity for polar molecules (e.g. H_2O,NH_3) than for non-polar molecules (Speil and Leineweber, 1969).

Of all the asbestos minerals, chrysotile is the most susceptible to acid attack. It is almost completely destroyed within one hour in 1 N HCL at 95°C. Amphibole fibers are much more resistant to mineral acids (Lindell, 1972).

The resistance of the asbestos fibers to attack by reagents other than acid is excellent up to temperatures of approximately 100°C with rapid deterioration observed at higher temperatures. Chrysotile is completely decomposed in concentrated KOH at 200°C. In general, organic acids have a tendency to react slowly with chrysotile (Speil and Leineweber, 1959).

All forms of asbestos available commercially have been shown to be carcinogenic in mice, rats, rabbits, and hamsters. Occupational health studies on workers engaged in the mining, milling amd manufacturing of asbestos have linked exposure of this mineral to lung carcinomas, mesotheliomas, gastrointestinal cancers, and pulmonary asbestosis.

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CRITERION FORMULATION

No appropriate data on the effects of asbestos on aquatic organisms are available at this time. Therefore, no freshwater or saltwater criterion can be derived for asbestos using the Guidelines because no Final Chronic Value for either fish or invertebrate species or a good substitute for either value is available, and there are insufficient data to estimate a criterion using other procedures.

ASBESTOS

Mammalian Toxicology and Human Health Effects

Summary

Estimating a risk factor for ingestion of asbestos presents significant difficulties. Although gastrointestinal cancer has been linked to occupational exposures in several groups of workers, no definitive data exist on the effects of direct ingestion of asbestos, either in animals or humans. Further, only limited information exists on air exposure levels for those human studies showing excess risk of gastrointestinal cancer and peritoneal mesothelioma. Nevertheless, the most valuable data on risk are those from human inhalation exposures, and these will form the primary basis for a projected criterion.

This document is not an exhaustive review of all asbestos literature nor are all important papers mentioned herein. However, the papers selected are deemed relevant for estimating dose-response relationships.

EXPOSURE

Analytical Techniques

The analytical techniques for the measurement of asbestos minerals in air or water samples collected in occupational or general environmental circumstances are time-consuming, and the results are often highly variable. No single method is suitable for all monitoring circumstances. Techniques appropriate for monitoring workplace exposures are unreliable when used to evaluate the much lower environmental concentrations of asbestos, such as those found in water, largely because of the presence of quantities of other inorganic and organic material. Electron microscopic methods used for environmental monitoring are difficult to perform and costly. Reproducible results can be obtained in experienced laboratories if standardized techniques are utilized, careful quality control is maintained, and periodic interlaboratory comparison of results is made. With careful analysis of water, interlaboratory precision can achieve relative standard deviations of from 30 to 65 percent (Anderson and Long, 1978; Chopra, 1978), but without standardization intralaboratory variability can be as great as a factor of ten, and interlaboratory variability can exceed two orders of magnitude (Brown, et al. 1976)

Environmental - Water: Considerable effort has taken place in recent years to standardize techniques for the quantitation of mineral fibers in water. All work to date has utilized electron microscopy. The presence of numerous diatom spicules and other non-asbestos fibers in water and the great difficulty of uniquely identifying mineral species or classes by optical microscopy would appear to preclude the use of optical microscopy for even the quantitation of large asbestos fibers in water. With electron microscopy, however, relatively few experimental problems remain, and reproducible results can be obtained by experienced laboratories. The disadvantage of this method is the cost and time of analysis and the limited availability of laboratories for the analysis of samples.

The U.S. EPA has proposed an interim method for the analysis of asbestos in water (Anderson and Long, 1978). From a 1-liter sample, 50 to 500 ml is filtered through 0.1 micron polycarbonate (Nuclepore) filter. A portion of the filter is placed on an electron microscope grid and dissolved by the Jaffe wick method and scanned by transmission electron microscopy at 10,000 to 20,000 magnification. Prior to dissolution, the flat polycarbonate filters are coated with carbon which serves to enmesh the collected material and to reduce losses during dissolution of the filter material by chloroform. Twenty grid squares or 100 fibers are counted. The identification of fiber type is by morphology for chrysotile and by selected area electron diffraction for amphiboles. No attempt is made to determine the amphibole mineral species. If necessary, this can be done using energy-dispersive X-ray analysis of each fiber. All individual fibers (length greater than three times width), irrespective of length are counted in the grid squares scanned. The fibers in large clumps though are not counted individually. For surveillance of large numbers of water systems, the procedures serves to identifiy those with significant quantities of asbestos present.

A previously used technique of condensation washing of cellulose acetate Millipore filter pieces on carbon coated grids using acetone can result in significant losses unless extreme care is taken. Carbon coating of the Millipore filter is ineffective in enmeshing the fibers because many of them are trapped deep within the interstices of the membrane filter. Condensation of acetone on the grid can result in the formation of pools of solvent on the filter which wash away fibers. Losses as great as 80 percent have been reported using this technique (Chatfield, et al. 1978; Beaman and File, 1976; Chopra, 1978).

Eighteen analytical laboratories participated in an American Society for Testing and Materials (ASTM) Task Group study of the measurement of amphibole and chrysotile fibers in water. Table 1 lists the data on the interlaboratory precision that has been obtained by this group in the analysis of both chrysotile and amphibole fibers. The Task Group concluded:

> The transmission electron microscope is the best basic instrument for the analysis, particularly when it is equipped with selected area electron diffraction and energy-dispersive spectroscopy capabilities. The mean fiber concentrations by different groups agree within a factor of two. The interlaboratory reproducibility of 50 percent can be expected in relatively clean water samples unless the concentration is low. In samples with high concentrations of interfering solids, the precision will not be as good. When applied on a broad scale there are variable and significant losses associated with the condensation washing of samples containing amphibole. The losses are low and less variable when condensation washing is used to prepare samples containing chrysotile (Chopra, 1978).

Environmental - Air: As with water, the analysis of ambient air samples by optical techniques introduces significant difficulties. First, the quantity of asbestos in ambient air is only a small fraction of the total aerosol. This aerosol contains large quantities of organic and mineral material of various origins, including many fibers other

TABLE 1

Interlaboratory Precision Obtained in the Analysis of Water Samples for Chrysotile and Amphibole Minerals[a]

Sample type	Number of laboratories reporting	Mean fiber concentration (10^6 fibers of all sizes/l)	Relative standard deviation of analysis (%)
Chrysotile	10	877	35
Chrysotile	9	119	43
Chrysotile	11	59	41
Chrysotile	9	31	65
Chrysotile	9	28	32
Chrysotile	3	25	35
Amphibole	11	139	50
Amphibole	4	95	52
Amphibole	14	36	66

[a] Anderson and Long, 1978. See also Chopra, 1978.

than asbestos. Therefore, enumeration of fibers collected in ambient air may have little relevance to the asbestos material present. In one instance, a comparison of 25 ambient air samples collected in buildings, some of which were contaminated with asbestos, showed no correspondence between concentrations of fibers longer than 5 µm, as determined using optical microscopic techniques, and the total mass of asbestos present, quantitated by electron microscopic methods (Nicholson, et al. 1975). Here, using the National Institute for Occupational Safety and Health (NIOSH) technique, no fiber concentrations measured exceeded 0.03 f/ml, and contributions to the measured filter concentration from other than asbestos fibers were felt to be significant. A review (Duggan and Culley, 1978) of the results of the analysis of six side-by-side ambient air samples by nine laboratories also highlighted the difficulty of using optical microscopy at low asbestos concentrations. They found that intralaboratory variability could exceed a factor of 10 and the results between laboratories could differ by a factor of 100. The possibility exists that optical techniques using petrographic, polarized light microscopes or dispersion staining techniques could produce better results. This has not been investigated, however.

A variety of techniques, each of which utilizes electron microscopy, have been developed for the analysis of asbestos in the ambient air. However, at the present time, there is less agreement on an ideal method than for water analysis. Two general electron microscopic techniques are utilized for the analysis. One involves the collection of asbestos on cellulose acetate (Millipore) or polycarbonate filters (Nuclepore) (Samudra, et al. 1978) and its subsequent transfer to electron microscope grids. For samples collected on cellulose acetate filters, the filter and collected material are ashed, the ash suspended in water and the suspension filtered through a polycarbonate filter. Such filters are then processed using techniques similar to those used for water and previously discussed (See "Water" subsection). Although not well studied, the use of flat surfaced polycarbonate filters in field situations may lead to losses of particles prior to sample preparation for analysis.

Direct transfer techniques have other limitations. Ambient aerosols are made up of agglomerates of particles with asbestos fibers attached to a variety of other material. Chrysotile asbestos, for example, with a negative surface charge, readily adheres to any of the large number of positively charged particles, such as clays, in the ambient air. Without dispersal, these agglomerations can result in the asbestos being obscured when viewed by an electron microscope. Further, agglomeration can occur on the filter during the long collection times required to quantitate low concentrations. In many cases, these agglomerates, which usually are of respirable size, contribute the most to the mass of the sample. Also, they may occur so infrequently that a statistically reliable measure of their quantity difficult to obtain. To obviate these difficulties, techniques have been developed in which collected material and filter are ashed in a low-temperature, activated oxygen furnace. The resulting residue is dispersed by physical means, either through the application of ultrasonic energy or grinding, and is enmeshed in a nitrocellulose or collodian film for mounting on electron microscope grids or is refiltered through a polycarbonate filter. Such "rub-out" methods also involve losses and, as with washing techniques, require skilled development of the process. A significant disadvantage of this procedure is that the initial physical state of the asbestos is altered prior to enumeration. Therefore,information on the fiber size distribution is not available. Only mass concentrations can be determined. (Nicholson, 1971; Nicholson and Pundsack, 1973).

To date, less uniform agreement has been obtained in the analysis by different laboratories of air samples than for water. In one interlaboratory comparison of samples collected near a road surfaced with serpentinite rock and analyzed for the mass of chrysotile asbestos, intralaboratory differences exceeded two orders of magnitude, and interlaboratory differences for laboratories using different analysis techniques exceeded four orders of magnitude. Fiber counts were similarly variable (U.S. EPA, 1977). On the other hand, relatively good agreement (average relative standard deviation of 25 percent) was achieved by three laboratories in the analysis for amphiboles of 12 samples collected in Silver Bay, Minnesota (U.S. EPA, ERLD, 1976).

Analysis of amphiboles in air around Lake Superior by the U.S. EPA and the State of Minnesota has been done using a cellulose ester filter for collection. The filter is shipped to the laboratory where it is ashed in a low temperature oxygen-activated furnace. The residue is resuspended and filtered through a polycarbonate filter. Good recovery and low losses are claimed by the investigators (P.M. Cook, 1978).

Occupational: In occupational circumstances, the current method of quantitating asbestos air concentrations is to enumerate all fibers longer than 5 microns (5 µm) collected on a specified area of filter, utilizing phase contrast light microscopy at 400X magnification (NIOSH, 1972). Such instrumentation does not allow identification of the fibers according to mineral type or even sufficient to establish if they are organic or mineral in origin. In general, when the principle fiber in an aerosol is known to be asbestos, this presents no problem. However, in some occupational circumstances, as with the use of insulation materials, fibers of various origins are present in the same material, and this can result in overestimates of the actual asbestos concentrations.

The adoption of a 5 µm cutoff for the length of fibers enumerated was imposed by limitations of light microscopy. It has long been known that fibers longer than 5 µm and visible by phase contrast microscopy represent only a small fraction of the total number of asbestos fibers in the air (Lynch, et al. 1970). This would present no problem were fiber size distributions similar in different circumstances. However, such is not the case. It has been shown, using electron microscopy that when chrysotile asbestos concentrations in different exposure circumstances are enumerated, the fraction greater than 5 um may vary by tenfold (from 0.4 percent of the total number of fibers present to approximately 5.0 percent). When amphibole varieties of asbestos are also considered, the fraction counted can vary more than 100-fold (Nicholson, et al. 1972). Thus, we do not have an accurate yardstick for the quantitation of asbestos air concentration in the work place. This does not present serious problems when monitoring for standard compliance but complicates comparisons of health effects between various industrial processes such as mining, manufacturing, and end-product use. It also complicates extrapolations of dose-response relationships determined in occupational circumstances to lower concentrations of asbestos measured in the general environment by other techniques. Nevertheless, when assessing exposure in a defined asbestos aerosol, the precision of optical methods can be good. NIOSH (1976) has estimated that a coefficient of variation of about 20 percent can be achieved in the assessment of asbestos concentrations greater than 0.1 f/ml.

Although fiber counts have been utilized for the assessment of occupational asbestos exposure since 1966, in prior years other methods, usually involving total particle counts (fibrous and non-fibrous), were utilized. Some attempts have been made to relate these earlier counts to present day fiber concentrations (Lynch and Ayer, 1966). However, these have been found to depend strongly on the particular asbestos use process, and no universal conversion factor is available that would relate total particle concentrations in a given circumstance with asbestos fiber counts. It is unfortunate that earlier data have limited relevance, since the disease experience that we are seeing today is the result of exposures that took place 20, 30 or more years previously when work conditions may have been considerably different from those currently existing. Thus, dose-response relationships are tenuous and can only be approximate, based upon current data.

Intercomparison of Techniques: All data, scant as they are, that relate asbestos disease to exposure are derived from studies of workers exposed in occupational environments. In these studies, concentrations of fibers longer than 5 um were determined using optical microscopy or were estimated from optical microscopic measurements of total particulate matter. On the other hand, all current low level environmental assessments utilize electron microscopic techniques which are not comparable to those used in the workplace since optical techniques do not provide data on the number of fibers less than 5 µm in length. To extrapolate dose-response data obtained in studies of working groups to environmental exposures, it is necessary to establish the relationship between optical fiber counts and mass or total fiber number determined by electron microscopy.

Recent studies have attempted to relate optical fiber counts (fibers > 5 µm) and TEM counts (all EM-countable fibers). An interlaboratory comparison of optical versus EM counts of chrysotile fibers suggested an average relationship between optical counts and TEM counts of 1:1000 (Winer and Cossette, 1978). The samples studied included air samples from six plants (one asbestos-cement, one brake lining, two treating mills, and two textile plants). Lower ratios are expected for amphibole fibers. An analysis by the U.S. EPA (Personal communication, J. Millette) relating optical fiber counts of fibers longer than 5 microns to total fiber counts by transmission electron microscopy gave a ratio of 400 for six samples of asbestos ceiling insulation material (which, however, may contain fibers other than asbestos and were not actual air samples). Other data by Wallingford (1978) suggest a ratio as low as 15 for EM count to optical counts.

Some data exist that relate optical fiber counts (longer than 5 um) to the total mass of asbestos as determined by electron microscopic techniques or by other weight determinations of collected airborne asbestos fibers. These are listed in Table 2 and provide crude estimates of a conversion factor relating fiber concentrations (f/ml) to airborne asbestos mass ($\mu g/m^3$). The proposed standards for asbestos in Great Britain by the British Occupational Hygiene Society stated that a "respirable" mass of 0.12 mg asbestos/m^3 was equivalent to 2 f/ml (BOHS, 1968). It was not stated how this relationship was determined. However, if it was from magnesium determinations in an aerosol, the weight determination would likely be high because of the presence of other non-fiberous, magnesium-containing compounds in the aerosol. Such was the case in the work of Lynch, et al. (1970), and their values for the conversion factor are undoubtedly overestimates. The data of Rohl, et al. (1976) are likely to

TABLE 2

Measured Relationships

Between Optical Fiber Counts and Mass of Airborne Chrysotile

Sampling situation	Fiber* counts (f/ml)	Mass concentration ($\mu g/m^3$)	Conversion factors $\frac{\mu g/m^3}{f/ml}$ or $\frac{\mu g}{10^6 f}$	$10^3 f/mg$
Textile factory BOHS (1968) (weight versus fiber count)	2	120	60	16
Air chamber monitoring Davis, et al. (1978)	1950	10,000	5	200
Monitoring brake repair work Rohl, et al. (1976) (E.M. mass versus fiber count)	0.1 to 4.7 (7 samples)	0.1 to 6.6	0.7 to 24[a] mean = 6	170
Textile mill			150[b]	6.7
Friction products mfg.			70[b]	13.9
Pipe mfg. Lynch, et al. (1970)			45[b]	22.5

*All fiber counts used phase contrast microscopy and enumerated fibers longer than 5 μm.

[a] Conversion factor may be low due to losses in E.M. processing.

[b] Conversion factor may be high because of overestimate of asbestos mass on the basis of total magnesium.

be underestimates because of possible losses in the determination of mass by electron microscopy. No data exist on the procedures used to determine the mass of chrysotile in the data presented by Davis, et al. (1978).

The range of 5 to 150 for the conversion factor relating mass concentration to optical fiber concentration is great, and any average value derived from it has a large uncertainty. However, for the purpose of extrapolating to low mass concentrations from fiber count, the geometric mean, 30 $ug/m^3/f/m$, of the above range of conversion factors will be used. The accuracy of this value is felt to be no more than a factor of 5 and this uncertainty severely limits any extrapolation in which it is used. In the case of amosite, the data of Davis, et al. (1978) suggest that a conversion factor of 18 is appropriate. However, since this data yielded lower chrysotile values than all other chrysotile estimates, it may also be low for amosite.

Ingestion from Water

Asbestos is commonly found in domestic water supplies. Of 775 recent samples analyzed by electron microscopy under the auspices of the U.S. EPA, 50 percent had detectable levels of asbestos, usually of the chrysotile variety (Millette, 1979a). Table 3 lists the distribution of the concentrations of these samples.

Earlier, asbestos had been reported in a variety of Canadian water supplies (Cunningham and Pontefract, 1971). These waters were found to contain from 2.0 to 172.7 x 10^6 fibers/l. Two U.S. river systems were also reported to contain chrysotile at average levels of from 0.3 to 1.5 ug/l (Nicholson and Pundsack, 1973). Other reports include that of Kay (1973) who found from 0.1 to 4 x 10^6 f/l in various Canadian drinking water sources.

During 1973, large amounts of asbestos-like fibers of amphibole minerals were found in the waters of Lake Superior, the source of drinking water for Duluth, Minnesota, and other cities (Cook, et al. 1974; Nicholson, 1974; Cook, et al. 1976). Fiber concentrations during normal lake conditions ranged from 20 x 10^6 to 75 x 10^6 fibers/l and from about 5 to 30 ug/l in terms of mass (Nicholson, 1974). During storm conditions amphibole fiber concentrations as high as 600 x 10^6 f/l were observed (Cook, et al. 1976). Filtration plants now used in Duluth maintain fiber concentrations below 0.1 x 10^6 f/l (Millette, 1979a).

Certain U.S. water systems currently have high levels of asbestos as a result of serpentine or amphibole deposits

TABLE 3

Distribution of Concentration of Asbestos in 775 Samples of Drinking Water from 42 States[a]

Asbestos concentration (10^6 fibers of all lengths/l)	Number of samples	Percentage of samples
Below detectable limits[b]	386	49.8
Less than 1	340	43.9
1 - 2	13	1.7
2 - 5	13	1.7
5 - 10	2	0.3
Greater than 10	21	2.7

[a] Millette (1979a).

[b] For these analyses average detectable limits were 5×10^5 fibers/l. However, significant variations occurred in some instances due to the presence of non-asbestos fibers.

in their water sheds. These include Everett, Washington, with concentrations of chrysotile above 10^7 f/l; Seattle, with from 1 to 10 x 10^6 f/l; and San Francisco, with chrysotile concentrations about 10^7 f/l in some systems (Millette, 1979a; Cooper, et al. 1978).

Under certain conditions, asbestos-cement (A/C) pipe may also contribute asbestos to municipal water supplies. Asbestos fiber concentrations in A/C pipe distribution systems were found to be as high as 38 x 10^6 chrysotile and 4 x 10^6 amphibole fibers/l in one Florida city; 17 x 10^6 in another Florida town; and 47 x 10^6 f/l in a Kentucky A/C pipe system. Water at the end of a little used A/C pipe line in Massachusetts contained as much as 480 x 10^6 chrysotile f/l (Millette, 1976). Many of the A/C pipe systems in Connecticut have been sampled and analyzed (Craun, et al. 1977). The majority of samples taken after transit through A/C pipe showed concentrations under 1 x 10^6 f/l, and only one sample was over 10 x 10^6 f/l.

While there are an estimated 200,000 miles of A/C pipe now in use in the United States, it is apparent that not all A/C pipe sheds fibers. If the water is non-aggressive the pipe does not erode and contribute fibers to the water. Studies of five A/C pipe systems over a one year period showed that fibers were present in the water from the two systems with aggressive waters, and few, if any, fibers could be found in water samples from three systems with non-aggressive waters (McFarren, et al. 1977).

Sampling of representative water utilities throughout the United States has indicated that over half of the samples had water which was moderately aggressive and 16.5 percent had very aggressive water (Table 4) (Millette, et al. 1979b). Water supplies in both the very aggressive and moderately aggressive categories are potentially capable of eroding asbestos-cement pipe (i.e., 68.5 percent of U.S. water systems) although the very aggressive waters could be expected to result in the contribution of much higher fiber concentrations.

Most data on asbestos in water are expressed in terms of fiber concentrations, enumerating fibers of all sizes using appropriate electron microscope techniques. Some estimates exist (Millette, 1979a) relating chrysotile fiber concentrations to mass concentrations. Because the number-to-mass relationship is highly dependent on average fiber length and diameter, knowledge of the source of the fibers in the water is important in determining a conversion factor. Some average conversion factors are listed in Table 5.

Similar information on the relationship of fiber count and mass have been published by Kay (1973), whose data suggest that 10^6 fibers corresponds to from 2×10^{-4} to 2×10^{-3} ug in water systems. Data on asbestos concentrations from erosion of fibers from A/C cooling tower panels indicate that the mass of 10^6 fibers is from 0.01 to 0.2 ug (Lewis, 1977).

Based on the aforementioned data, it is concluded that the majority (approximately 95 percent) of water consumers

TABLE 4

Representative Average Water Utility Aggressiveness Indices[a]

Highly aggressive[b]	16.5 percent
Moderately aggressive[c]	52 percent
Nonaggressive[d]	31.5 percent

[a] Millette, et al. (1979b).

[b] Highly aggressive: $pH + \log_{10}(AH) < 10.0$

[c] Moderately aggressive: $pH + \log (AH) = 10.0 - 12.0$

[d] Nonaggressive: $pH + \log (AH) > 12.0$

where A = total alkalinity in mg/l, $CaCO_3$
H = calcium hardness as mg/l, $CaCO_3$

TABLE 5

Relationship of Total Fiber Counts by Electron Microscopy and Mass of Chrysotile Asbestos in Water[a]

Fiber Source	Average mass in ug of 10^6 fibers of all lengths
Natural erosion of serpentine rock (shorter fibrils)	0.002
A/C pipe (longer fibers)	0.01
Contributions from commercial dump site runoff and untreated discharge (more fiber bundles)	0.05

[a] From: Millette, 1979a.

in the United States are exposed to asbestos fiber concentrations of less than 10^6 f/l. In a few areas people are exposed to concentrations between 1 and 10 million f/l with intermittent exposures over 100 million f/l. There is at least one area where exposure is over 100 million f/l. Persons using asbestos-cement pipe in areas where the water is non-aggressive or is treated to prevent corrosion are generally not additionally exposed. In areas of aggressive water, however, the consumer may be exposed to added asbestos fiber concentrations of from fewer than 1 million to over 100 million fibers per liter, depending on factors such as length of pipe, flow rate and mineral content of the water.

The mass concentrations of chrysotile asbestos in the water of cities with less than 10^6 f/l are likely to be less than 0.01 µg/l, corresponding to a daily intake of less than 0.02 µg. However, in areas with significant contamination, whether from natural sources, man's activities, or erosion from A/C pipes, the intake of asbestos from water sources can exceed 2 µg/day.

Ingestion from Foods

There are scant data on the contribution of food products to population asbestos exposure. Cunningham and Pontefract (1971) showed that various beers and wines could contain quantities of asbestos fibers similar to those found in water systems (10^6 to 10^7 f/l). The source of this contamination could be from natural water sources or from the erosion of asbestos fibers from filters used to purify the product. Asbestos filters are currently used for the purification of beverages and a variety of other food products, but little data exist on possible fiber contamination from such sources. Contamination of drinking water by fibrous glass and other synthetic fibers used in cartridge filters has been measured at concentrations in excess of 10^9 f/l (Cook, et al. 1978).

Exposure from Drugs

Erosion of chrysotile from asbestos filters, used to purify parenteral drugs, has been documented (Nicholson, et al. 1972). Contamination levels up to 1 ug/dose were noted in approximately one-third of drugs tested, indicating that filter erosion can be significant. Because of these findings, the use of asbestos filters for drug purification, without subsequent clean-up, has been prohibited by the F. D. A. (1976).

Inhalation

General Population Exposures: Asbestos of the chrysotile variety has been found to be a ubiquitous contaminant of ambient urban air. A study of 187 quarterly composite samples collected in 48 U.S. cities from 1969 to 1970 showed chrysotile asbestos to be present in virtually all metropolitan areas (Nicholson, 1971; Nicholson and Pundsack, 1973). Table 6 lists the distribution of values obtained in that study. Each represents an average of from five to seven 24-hour samples and thus averages over possible peak concentrations which could occur periodically or randomly. A second set of ambient air analyses is also shown for comparison (U.S. EPA, 1974). These studies utilized different analytical

TABLE 6

Distribution of 24-Hour Chrysotile Asbestos Concentrations in the Ambient Air of U.S. Cities[a]

	Electron Microscopic Analysis			
	Mount Sinai School of Medicine		Battelle Memorial Institute	
Asbestos Concentration (ng/m^3) less than	Number of samples	Percentage of samples	Number of samples	Percentage of samples
1.0	61	32.6	27	21.3
2.0	119	63.6	60	47.2
5.0	164	87.7	102	80.1
10.0	176	94.2	124	97.6
20.0	184	98.5	125	98.5
50.0	185	99.0	127	100.0
100.0	187	100.0	127	100.0

[a] Nicholson (1974) and U.S. EPA (1974).

techniques but the results agree well. In both studies, 98.5 percent of the 24-hour samples had chrysotile asbestos concentrations of less than 20 ng/m^3. Of the three samples greater than 20 ng/m^3 analyzed by the Mount Sinai School of Medicine, one was in a city having a major shipyard and another in a city that had four brake manufacturing facilities. Thus, these samples may include a contribution from a specific source in addition to that of the general ambient air.

Similar data with the same range of mass concentrations, have recently been reported from France, providing evidence of the presence of chrysotile in the ambient air of Paris (Sebastien, et al. 1976).

In a study of the ambient air of New York City, in which samples were taken during daytime working hours, values higher than those mentioned above were obtained (Nicholson, et al. 1971). These were six-to-eight hour samples collected between 8:00 A.M. and 5:00 P.M., and they reflect what could be intermittently higher concentrations from construction activities or automobile usage during those hours compared to night-time periods for example. Table 7 records the chrysotile content of 22 samples collected in the five boroughs of New York. It should be noted that the samples analyzed in all of the studies discussed above were taken during a period when fireproofing highrise buildings by spraying asbestos-containing materials was permitted. The practice was especially common in New York City. While no sampling station was known to be located adjacent to an active construction site, unusually high levels could

TABLE 7

Chrysotile Content of Ambient Air in New York City by Borough

(6 to 8-Hour Daytime Samples)[a]

Sampling locations	Number of samples	Asbestos air level in 10^{-9} g/m^3 (ng/m^3)	
		Range	Average
Manhattan	7	8-65	30
Brooklyn	3	6-39	19
Bronx	4	2-25	12
Queens	4	3-18	9
Staten Island	4	5-14	8

[a] Nicholson, et al, 1971.

nevertheless have resulted from the procedure.

To determine if construction activities could indeed be a significant source of chrysotile fiber in the ambient air, six-to-eight hour daytime sampling was conducted in lower Manhattan in 1969 near sites where extensive spraying of asbestos-containing fireproofing material was taking place. Table 8 shows the results of this sampling and demonstrates that spray fireproofing did contribute significantly to asbestos air pollution. In some instances, chrysotile asbestos levels approximately 100 times the concentrations typically found in ambient air were observed.

Asbestos contamination has also been documented by analysis of samples collected within buildings. In a study of 116 samples collected in or near 19 buildings (primarily office) in 5 U.S. cities, average chrysotile air concentrations ranged from 2.5 ng/m^3 to 200 ng/m^3, with individual measurements from 0 to 800 ng/m^3 (Nicholson, et al. 1975). For the outside air, the variation for the average concentration at a given site extended from 0 to 48 ng/m^3. Buildings in which a loose asbestos fireproofing material was applied to the structural steel surfaces had evidence of significant asbestos contamination. Also, schools in which similar material had been applied have been found to be seriously contaminated. Optical fiber counts exceeding 2 f/ml in a library and other areas of student use were observed during activities which disturbed loose asbestos (Sawyer, 1977; Nicholson, et al. 1978). Ambient air chrysotile concentrations in schools, in absence of any disturbance of the asbestos

TABLE 8

Chrysotile Air Levels Near Spray Fireproofing Sites in New York City (6 to 8 Hour Daytime Samples)[a]

Sampling locations (distance from site)	Number of samples	Asbestos air level 10^{-9} g/m^3 (ng/m^3) Range	Average
1/8 - 1/4 mile	11	9 - 375	60
1/4 - 1/2 mile	6	8 - 54	25
1/2 - 1 mile	5	3.5 - 36	18

(The above concentrations reflect both downwind and upwind sampling locations.)

[a] Nicholson, et al. (1971).

ranged up to 2,000 ng/m^3 (Nicholson, et al. 1978; Sebastien, et al. 1976). Finally, analysis of the air of asbestos workers' homes indicate that chrysotile concentrations as high as 5,000 ng/m^3 can be encountered (Nicholson, et al. 1978).

Figure 1 summarizes the ranges of chrysotile concentrations in the variety of environmental and occupational circumstances discussed above. The concentration ranges are only approximate and in most cases are limited because of the limited number of samples taken in given circumstances. Extension to higher and lower concentrations would be expected with the availability of more data.

Although the fate of the asbestos in inspired air is only approximately known, it appears that eventually more than half the asbestos inhaled will be swallowed (See "Effects" section). Assuming that an individual breathes 10 m^3 in 24 hours, most ambient air levels of chrysotile (1 to 10 ng/m^3) result in exposures to the gastrointestinal tract less than 0.05 µg/day of asbestos, although, in some circumstances, inhalation could produce gastrointestinal exposures exceeding 0.1 µg/day. These exposures are to be compared with those from water ingestion which lead to daily intakes of less than 0.02 µg (See "Ingestion from Water" subsection). Though the data of Tables 3 and 6 are not related to the same population bases, it would appear that inhalation can give rise to exposures at least equal to that of direct ingestion for most of the population of the United States.

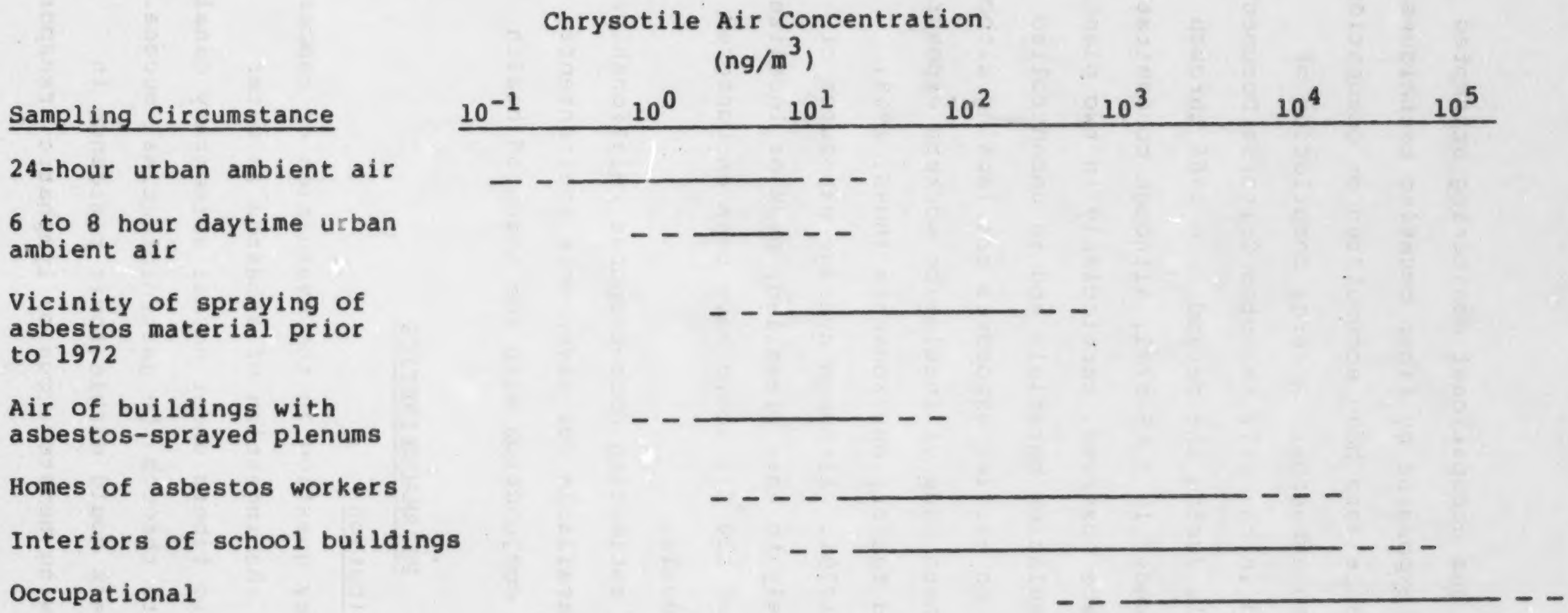

Figure 1: Environmental Air Concentrations of Chrysotile Asbestos

Only after 1966 has occupational monitoring attempted to quantify asbestos exposures by fiber counting techniques. Since then, considerable data have accumulated on occupational exposure of workers to asbestos. A large compilation of such data is included in the 1972 Asbestos Criteria Document (NIOSH, 1972). Levels during the period from 1966 through 1971 were generally under 10 f $>$ 5um/ml, although concentrations exceeding 100 f/ml were observed, particularly in two plants producing amosite insulation materials and in uncontrolled textile mills. Data on earlier exposures are lacking although some estimates have been made of insulation workers exposure (Nicholson, 1976) and factory environments (BOHS, 1968; Newhouse and Berry, 1979). Although average exposures of 10 to 40 f/l are likely to have prevailed, peak or localized exposures in excess of 100 f/l would have been encountered often by some individuals.

For purposes of estimating dose-response relationships, those data that are available for given work environments will be discussed in conjunction with the measured health effects.

PHARMACOKINETICS

Absorption and Distribution

Ingestion: A key question in the evaluation of cancer risk associated with the ingestion of asbestos in water is whether microscopic fibers under normal alimentary canal conditions can migrate through the gastrointestinal mucosa. Such movement of fibers could enable their residence in bowel wall or, following hematogenous or lymphatic transport, the peritoneum and other organ tissues.

Some studies of tissues of animals that had ingested fibers report no evidence of fiber transport through the gastrointestinal lining (Gross, et al. 1974). These results, however, have been called into question on the basis of the insensitivity of the assay technique used (Cooper and Cooper, 1978). Evidence for such movement is reported in other studies (Cunningham and Pontefract, 1973). Cunningham, et al. (1977) observed chrysotile fibers in the blood and tissues of rats which previously were fed a diet of one percent chrysotile asbestos for six weeks. Westlake, et al. (1965) identified chrysotile fibers in the colon mucosa of rats fed chrysotile asbestos. Scanning electron micrographs have revealed large amosite asbestos fibers penetrating epithelial cells of rat jejunal mucosa tissue (Storeygard and Brown, 1977). Kidney cortex tissue of a neonate baboon fed chrysotile for nine days was found to contain a statistically significant ($P = 0.005$) excess of chrysotile fibers compared to kidney cortex tissue from an unexposed neonate baboon (Patel-Mandlik and Hallenbeck, 1978). Cunningham and Pontefract (1974) observed passage of chrysotile fibers from the blood across the placenta to the fetus.

Ingestion of small particles other than asbestos has also resulted in the subsequent observation of particle accumulation in tissues of animals. Mice that drank water suspensions of 2 um diameter latex spheres for two months were found to have the latex particles accumulated in macrophages in intestinal Peyer's patches (LeFevre, et al. 1978).

Latex particles of 0.22 μm were reported to migrate from rat stomachs to lymphatics of the mucosa and also to liver and kidney tissues (Sanders and Ashworth, 1960). Much larger particles of silica, opal phytoliths from plants, are observed in digested mesenteric lymph node and kidney tissue from sheep which eat cereal chaff and grains (Nottle, 1977).

Evidence for the human intestinal uptake ("persorption") of particles as large as 75 μm is provided by the observation of starch granules in blood only minutes after ingestion (Volkheimer, 1974). Sleep, smoking, and caffeine are reported to increase the number of starch particles in the blood. Dyed cellulose particles are also identified in human blood and urine following ingestion of specially stained plant food (Schreiber, 1974). The cellulose fibers are found in urine several weeks after ingestion. Langer (1974) found asbestos fibers in extrapulmonary organ tissues of asbestos workers, although fewer than in lung and pleura tissue. More fibers in kidney than in liver, pancreas, adrenal, or spleen tissue. Fiber concentrations in human extrapulmonary organ tissues from individuals with a history of ingestion of fibers (no inhalation exposure) with drinking water have not been reported due to lack of required analytical sensitivity (Cook, 1978).

Human urine sediment examined by transmission electron microscopy may contain amphibole fibers which originate from ingestion of drinking water contaminated with these mineral fibers (Cook and Olson, 1979). Ingestion of filtered water results in eventual disappearance of amphibole fibers from urine. These observations provide direct evidence for the passage of mineral fibers through the human gastrointestinal mucosa under normal alimentary canal conditions. Measured concentrations of amphibole fibers eliminated in urine represent approximately 1×10^{-3} of the number of fibers ingested with drinking water. To the extent that some fibers are permanently retained by the body or eliminated by other routes after passage across the gastrointestinal wall, the urine concentrations are an underestimate of ingested fiber absorption.

Inhalation: Inhalation of asbestos dust is accompanied by ingestion of many fibers cleared from the respiratory tract by mucociliary action. The occurrence of peritoneal mesothelioma, excess gastrointestinal tract cancers, and possibly cancers at other non-respiratory tract sites could result from migration of fibers through the gastrointestinal mucosa. The amount of inhaled asbestos which is eventually ingested is important for an assessment of cancer risk based on the excess gastrointestinal cancer observed for occupational exposures (See "Effects" section).

Whether inspired asbestos fibers will be deposited in the lung depends strongly upon their diameter. Timbrell (1965) has shown that a fiber, independent of its length, behaves aerodynamically like a particle having a diameter three times as great. Brain and Volberg (1974) have developed a model for aerosol deposition in the respiratory tract according to aerodynamic parameters. They indicate that about 50 percent of particles with a mass median diameter of less than 0.1 µm will be deposited on nonciliated pulmonary surfaces. This fraction falls slowly to 25 percent at 1 µm and to zero at above 10 µm. Deposition on nasal and pharyngeal surfaces becomes important at 1 µm and rises rapidly to be the dominant deposition site for particles 10 µm in diameter or greater. Thus, few fibers with a diameter as large as 2 µm are likely to penetrate into the alveolear spaces, although finer fibers, even as long as 200 µm, may do so.

Once inhaled, a large fraction of the inhaled dust is rapidly cleared from the respiratory tract by mucociliary action although some fibers will remain in the lung and be found there decades after exposure (Pooley, 1973; Langer, 1974). Because of the ubiquitous exposure of individuals to asbestos, chrysotile fibers can be found in the lungs of most urban dwellers (Langer, et al. 1971; Gross, et al. 1973). Additionally, larger fibers trapped in the lungs may become coated and form asbestos bodies. These can be readily observed by optical microscopy in tissue sections and in lung smear (Thomson, 1963; Langer, et al. 1973). The number of fibers or asbestos bodies found in given circumstances depends strongly upon the nature of the previous exposure of the individual.

The clearance of asbestos from the respiratory tract of rats has been studied directly in a series of experiments (Morgan, et al. 1975; Evans, et al. 1973). Samples were made radioactive by neutron irradiation, which enabled the mass of asbestos in various tissues to be determined. In a series of 30-minute exposures with different varieties of chrysotile, the deposition and clearance in the respiratory tract were followed. At the conclusion of the inhalation, the distribution in various organ systems was determined. The results are shown in Table 9. As can be seen, rapid clearance from the upper respiratory tract occurs with up to two-thirds of the fibers being swallowed and found in the gastro-intestinal tract. Long term respiratory tract clearance or drainage via the lymphatics leads to additional dissemination.

Other data on the deposition and retention of inhaled asbestos have been reported by Wagner, et al. (1974). Figure 2 shows the dust content of rat lungs following exposures to different asbestos varieties. As can be seen, the chrysotile content of the lung does not build up as significantly as that of the amphiboles for similar exposure circumstances. This is likely the result of some dissolution of chrysotile by body fluids.

Excretion

Most inhaled or directly ingested asbestos particles which pass through the gastrointestinal tract are excreted in feces (Cunningham, et al. 1976). As mentioned previously, some fibers are absorbed by the gastrointestinal tract and are eventually eliminated through the urinary tract (Cook and Olson, 1979).

TABLE 9

Distribution of Fiber at the Termination of Exposure (% of Total Deposited)[a,b]

Fiber	Nasal passages[b]	Esophagus	GI tract	Lower respiratory tract
Chrysotile A	9 ± 3	2 ± 1	51 ± 9	38 ± 8
Chrysotile B	8 ± 2	2 ± 1	54 ± 5	36 ± 4
Amosite	6 ± 1	2 ± 1	57 ± 4	35 ± 5
Crocidolite	8 ± 3	2 ± 1	51 ± 9	39 ± 5
Anthophyllite	7 ± 2	2 ± 1	61 ± 8	30 ± 8
Fluoramphibole	3 ± 2	1 ± 1	67 ± 5	29 ± 4

[a] Morgan, et al. (1975).

[b] Mean and SD.

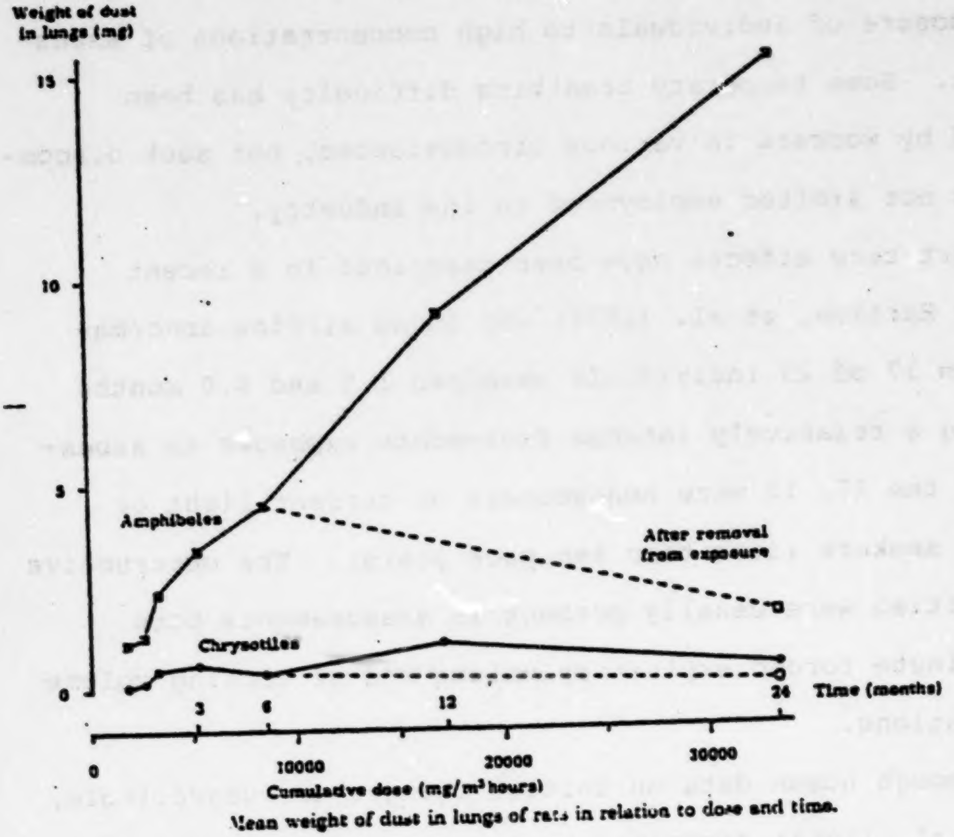

Figure 2. Mean weight of dust in lungs of rats in relation to dose and time (Wagner, et al. 1974).

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EFFECTS

Acute, Subacute, and Chronic Toxicity

Acute effects are of little consequence in the inhalation exposure of individuals to high concentrations of asbestos dust. Some temporary breathing difficulty has been reported by workers in various circumstances, but such discomfort has not limited employment in the industry.

Short-term effects have been described in a recent study by Harliss, et al. (1978) who found airflow abnormalities in 17 of 23 individuals examined 1.5 and 8.0 months following a relatively intense five-month exposure to asbestos. Of the 17, 12 were non-smokers or current light or ex-light smokers (less than ten pack years). The obstructive abnormalities were usually present in measurements both of one minute forced expiratory volume and of closing volume determinations.

Although human data on initial changes are unavailable, Holt, et al. (1964) described early (14-day) local inflammatory lesions found in the terminal bronchioles of rats following inhalation of asbestos fibers. These consisted of multinucleated giant cells, lymphocytes and fibroblasts. Progressive fibrosis followed within a few weeks of the first exposure to dust. (These early alterations in animals may be related to the early human findings above). Davis, et al. (1978) described similar early lesions in rats consisting of a proliferation of macrophages and cell debris in the terminal bronchioles and alveolae.

Jacobs, et al. (1978) fed rats 0.5 mg or 50 mg of chrysotile daily for one week or 14 months and subsequently examined gastrointestinal tract tissue by light and electron michroscopy. No effects were noted in esophagus, stomach or cecum tissue but structrual changes in the ileum were seen, particularly of the villi. Considerable cellular debris was present by light microscopy in the ileum, colon and rectum tissue. The electron microscopic data confirmed that of light microscopy and indicated the observed changes were consistent with a mineral-induced cytotoxicity.

A single oral administration of from 5 to 100 mg/kg of chrysotile to rats has produced a subsequent increase in thymidine in the stomach, duodenum, and jejunum (Amacher, et al. 1975). This suggests that an immediate response of cellular proliferation and DNA synthesis may be stimulated by chrysotile ingestion.

The long-term disease entity, asbestosis, resulting from the inhalation of asbestos fibers is a chronic, progressive pneumoconiosis. It is characterized by fibrosis of the lung paremchyma, usually radiologically evident after ten years from first exposure, although changes can occur earlier following more severe exposures. Shortness of breath is the primary symptom; cough is less common; and signs such as rales, finger clubbing, and, in later stages of the disease, weight loss appear in a proportion of cases. The disease was first reported seven decades ago (Murray, 1907) and has occurred frequently among workers occupationally exposed to the fiber in ensuing years. Characteristic x-ray changes are small irregular opacities, usually in the lower and middle lung fields, often accompanied by evidence of pleural fibrosis or thickening, and/or pleural calcification. Both the visceral and, more commonly, parietal pleura may be involved. The mechanism of action and translocation of asbestos fibers to the parietal pleura is uncertain; both direct migration (Kiviluoto, 1960) or transport via lymphatics (Taskinen, et al. 1973) have been suggested.

Currently, 50 to 80 percent of individuals in occupational groups with exposures beginning more than 20 years earlier have been found to have abnormal x-rays. These include asbestos insulation workers (Selikoff, et al. 1965), miners and millers (Mount Sinai, 1976) and asbestos factory employees (Lewinsohn, 1972). In many circumstances the disease progresses following cessation of exposure; in a group employed in an asbestos factory for various periods of time between 1941 and 1954, x-ray changes were observed years following exposure in individuals having exposures as short as one week (personal communication, I.J. Selikoff).

Restrictive pulmonary dysfunction is also seen with asbestos exposures and may be accompanied by diffusional defects or airway obstruction (Bader, et al. 1961). In the early stages of asbestosis, there is limited correlation between physiologic parameters, such as lung function tests. Later, x-ray changes and the lung function deficits are more highly correlated, but still incompletely so.

The above chronic effects are common among occupational groups directly exposed to asbestos fibers. They also, however, extend to those employed in other trades working near the application or removal of asbestos. Among workers other than insulators employed at a shipyard for longer than 15 years, 48 percent were found to have abnormal x-rays (Selikoff, et al. 1979a). Similar data were obtained in a study of maintenance personnel in a chemical plant (Lilis and Selikoff, 1979). Even family contacts (wives, children, etc.) of workers can be affected. Anderson, et al. (1976) have shown that 36 percent of 626 family contacts of workers employed some time between 1941 and 1954 at an asbestos insulation manufacturing facility had x-ray abnormalities years later characteristic of asbestos exposure.

In addition to disease and disablement during life, asbestosis has accounted for a large proportion of deaths among workers. The first reports of the disease (Auribault, 1906; Murray, 1907) described complete eradication of working groups. Much improvement in dust control has taken place in the industry since the turn of the century, but even recently those exposed in extremely dusty environments, such as textile mills, may have as much as 40 percent of their deaths attributable to this cause (Nicholson, 1976). Groups with lesser exposures for 20 or more years, such as in mining and milling (Mount Sinai, 1976) or insulation work (Selikoff, et al. 1979) may have from 5 percent to 20 percent of their deaths from pneumoconiosis. All varieties of asbestos appear equally capable of producing asbestosis, in both man (Irwig, et al. 1979) and animals (Wagner, et al. 1974). In groups exposed at lower concentrations such as the families of workers, there is less incapacitation, and death from asbestosis has not been reported.

Extra-pulmonary chronic effects reported include "asbestos corns" from the penetration of asbestos fibers into the skin and their incorporation in dermal layers, and instances of Caplan's syndrome (rheumatoid pneumoconiosis). No chronic, non-malignant gastrointestinal effects are reported.

Tetratogenicity

No data exist on the presence or absence of tetratogenic effects from the inhalation or ingestion of asbestos, although transplacental transfer of asbestos has been reported (Pontrefract and Cunningham, 1973; Cunningham and Pontrefract, 1974).

Mutagenicity

In a preliminary study chromosomal aberrations were seen in Chinese hamster cells cultured in a medium containing 0.01 mg/ml of either chrysotile or crocidolite (Sincock and Seabright, 1975). No aberrations were seen in culture with coarse glass fibers or with control media. A more extensive series of experiments by Sincock (1977), using several chrysotile and crocidolite samples, showed that both positive transformation of morphology and positive genetic responses result from the passive inclusion of asbestos in culture media of CHO-K1 Chinese hamster cells. Very fine fibrous glass produced the same abnormalities, but chemically leached asbestos fibers produced fewer abnormalities than those untreated. The principal results are shown in Table 10.

TABLE 10

Effects of Different Treatments on Chromosomes of CHO-KI - Chinese Hamster Cells[a]

	SPA. chrysotile	Rhodesian chrysotile a	Canadian chrysotile b	UICC crocidolite	UICC anthophyllite	UICC amosite	Glass 110	Control
Polyploids	28	23	27	26	2	14	3	4
Cells with fragments	13	14	11	10	10	16	0	0
Other abnormalities	33	9	15	29	9	13	0	0
Percent abnormal karyotypes		62	34	39	56	26	41	3

	Rhodesian chrysotile a	Rhodesian chrysotile a leached	Canadian chrysotile b	Canadian chrysotile b leached	UICC crocidolite	UICC crocidolite milled	Glass 110	Control
Polyploids	23	6	26	10	26	6	6	4
Cells with fragments	13	0	9	0	14	9	0	0
Other abnormalities	10	0	16	4	28	3	0	0
Percent abnormal cells	34	6	42	14	57	16	6	4

[a] This table summarizes the principal results reported in Sincock (1977). Results were obtained using 48-hr exposure; 100 cells were scored from each culture. Categories of genetic damage were not mutually exclusive.

Chamberlain and Tarmy (1977) tested UICC asbestos samples of chrysotile, amosite, anthophyllite, and samples of superfine chrysotile on several strains of E. coli and S. typhimurium bacterial systems in which mutagenicity to exogenous materials appears to correlate well with animal carcinogenic test data. Several positive and negative controls were used in all experiments. No mutagenicity was observed in any of the bacterial strains. The authors point out that prokaryotic cells (bacteria) do not phagocytize the fibers as do eukaryotic cells, such as macrophages.

Carcinogenicity - Animal Data

Ingestion: Limited data exist on the carcinogenicity of asbestos administered by ingestion. With the exception of an abstract which reported negative data from 12 animals, published in 1967 (Bonser and Clayson, 1967), no reports were extant on the effects of ingested asbestos until the finding of large amounts of cummingtonite-grunerite fibers in Lake Superior and the drinking water of Duluth, Minnesota focused attention on the problem. As an outgrowth of the Reserve Mining Company trial in which the federal government sought abatement of the Lake Superior pollution, two compilations from four laboratories were made of studies which showed negative results on the ingestion of asbestos.

Smith (1973) reported results of feeding 45 hamsters one percent chrysotile or amosite in their diet. A neoplasm of the mesentry of the colon was found, which was discounted because no fibers were identified in the tumor; no details were given concerning how the fibers were sought. The actual dosage of asbestos was not given, nor were other relevant experimental details provided. However, the finding of fibers in tumor tissue would be unlikely and, as these tumors are rare in hamsters, this result cannot be dismissed out of hand.

Gross, et al. (1974) reported the results of a series of feeding experiments with chrysotile and crocidolite. The data were the unpublished results of various experiments conducted over the previous ten years by three laboratories. All available data on these experiments are listed in Table 11. The data are flawed for several reasons. The numbers in each experimental group were small, the doses administered limited, and significant information on experimental procedures lacking. Also, systematic histological examination, which was of most significance, was done on only 53 of over 200 animals.

Wagner, et al. (1977a) fed groups of 32 rats 100 milligrams per day of chrysotile or talc in malted milk for 100 days over a 6-month period of time. A small decrease in survival time was observed in the two study groups: 614 and 618 days versus 641 for the controls. Two gastric leiomyosarcomas were observed, one in each exposure group. Interpretation of the results of this experiment, too, is difficult because of the small number of animals in experimental groups.

As an outgrowth of concern for the use of asbestos filters in the purification of wine products and the possible effects of erosion of asbestos fibers from those fil-

TABLE 11

Summary of Experiments on the Effects of Oral Ingestion of Asbestos

Animal species	Material administered	Dosage	Animals examined for tumors	Findings (malignant tumors)	Average survival time
		Gibel, et al. (1976)			
25 male and 25 female Wistar rats	asbestos filter material containing 52.6% chrysotile	50 mg/kg bw/day in the diet for life	42	4 kidney carcinomas 3 reticulosarcomas 4 liver-cell carcinomas 1 lung carcinoma	441 days
25 male and 25 female Wistar rats	talc	50 mg/kg bw/day in the diet for life	45	3 liver-cell carcinomas	649 days
25 male and 25 female Wistar rats	control	control	49	2 liver-cell carcinomas	702 days
		Wagner, et al. (1977)			
32 Wistar SPF rats	UICC Canadian chrysotile in malted milk powder	100 mg/day 5 days/week for 100 days	32	1 gastric leiomyosarcoma	618 days
32 Wistar SPF rats	Italian talc	100 mg/day 5 days/week for 100 days	32	1 gastric leiomyosarcoma	614 days
16 Wistar SPF rats	control	control	16	none	641 days
		Gross, et al. (1974)			
10 male rats	ball-milled chrysotile mixed with laboratory chow	5% by weight of feed mix for 21 months	10	none	sacrificed

TABLE 11 (cont.)

Summary of Experiments on the Effects of Oral Ingestion of Asbestos

Animal species	Material administered	Dosage	Animals examined for tumors	Findings (malignant tumors)	Average survival time
			Gross, et al. (1974)		
5 "laboratory" rats	control	control	5	none	sacrificed
31 Wistar SPF rats	Rhodesian chrysotile 0.2%-0.4%	10 mg weekly for 16 weeks	31 less "a few"	2 breast carcinoma	not stated
33 Wistar SPF rats	crocidolite in butter 0.2% - 0.4% mixture	5 mg weekly for 16 weeks	33 less "a few"	none	not stated
34 Wistar SPF rats	crocidolite in butter 0.2% - 0.4% mixture	10 mg weekly for 16 weeks	34 less "a few"	1 lymphoma	not stated
24 Wistar SPF rats	control (butter)	control	(24?)	3 breast carcinoma 1 thigh sarcoma	not stated
35 Wistar SPF rats	N W Cape crocidolite in butter (0.2%-0.4%)	10 mg weekly for 18 weeks	35 less "a few"	none	not stated
28 Wistar SPF rats	Transvaal crocidolite in butter (0.2% to 0.4%)	10 mg weekly for 18 weeks	28 less "a few"	none	not stated
24 Wistar SPF rats	control (butter)	control	(24?)	none	not stated

TABLE 11 (cont.)

Summary of Experiments on the Effects of Oral Ingestion of Asbestos

Animal species	Material administered	Dosage	Animals examined for tumors	Findings (malignant tumors)	Average survival time
			Cunningham, et al. (1977)		
10 male Wistar rats	1% chrysotile+		7	2 kidney 1 peritoneal 1 lymphoma 1 fibrosarcoma 1 brain 1 pituitary	not given
10 male Wistar rats	control		8	1 peritoneal fibrosarcoma	not given
40 male Wistar rats	1% chrysotile	not given	36	3 thyroid 1 bone 1 liver 1 jugular body 2 leukemia/lymphoma 1 adrenal 1 large intestine anaplastic carcinoma 1 small intestine fibrosarcoma	not given
40 male Wistar rats	control		38	1 thyroid 1 liver 2 adrenals 1 kidney nephroblastoma 1 leukemia/lymphoma 5 subcutaneous tissue	not given

ters into the final product, a study was undertaken in which asbestos filter material was fed to rats (Gibel, et al. 1976). Twelve malignant tumors developed in experimental animals, including four kidney tumors. No tumors of this site were found in control groups. This observation of renal cancer takes on significance in the light of the finding of an elevated risk of kidney cancer among asbestos insulation workers (Selikoff, et al. 1979) and a high excretion of asbestos fiber in the urine of humans drinking fiber-contaminated water (Cook and Olson, 1979). However, this report provides only limited experimental detail, and the filter material was composed of sulfated cellulose and a condensation resin in addition to 52.6 percent chrysotile asbestos. The presence of other substances confounds the study in relation to asbestos carcinogenicity.

Cunningham, et al. (1977) conducted two limited feeding studies of male Wistar rats. One percent chrysotile asbestos with five percent corn oil was added to rat chow diet and fed to groups of 10 and 40 rats in two separate experiments. In the first study, six of seven surviving animals were found with tumors whereas only one malignancy was observed in eight controls (See Table 11). No gastrointestinal tumors were seen, but two of the treated group tumors were kidney nephroblastomas. In the second, larger study, 11 tumors each were observed in treated and control groups of 40 animals. Two of the malignancies in the asbestos-fed group were of the gastrointestinal tract and one of the control group was a nephroblastoma, lessening the significance of the finding of this tumor in the other treated group. With the limited number of animals in this study, the evidence for carcinogenicity of asbestos (by feeding) is inconclusive.

Currently, a very large and carefully designed feeding experiment is being conducted under the auspices of the National Institute of Environmental Health Sciences. Results, however, are not anticipated until late 1980. Meanwhile, all previously reported experiments on ingested asbestos, whether positive or negative, have significant limitations. To extrapolate such data to man for use as a criteria for a standard would not be appropriate.

Inhalation: Although lung cancer was suggested as being causally related to human asbestos exposure in case reports in 1935 (Lynch and Smith, 1935; Gloyne, 1935), strongly indicated to be so in 1947 (Merewether, 1947), and unequivocally associated in a cohort study by Doll (1955), no positive animal data of consequence were forthcoming until 1967 when Gross, et al. (1967) showed that lung cancer could be produced by asbestos inhalation exposure. An early experiment of Nordmann and Sorge (1941) described two lung tumors in 10 of 100 mice surviving 240 days following exposure to high concentrations of chrysotile. This work, however, was called into question by Smith, et al. (1965) on the basis of the histology of the malignancies. Lynch, et al. (1957) exposed AC/F, hybrid mice to commercial chrysotile and observed a higher incidence of pulmonary adenomas in exposed animals, 45.7 percent (58/127), compared to controls, 36.0 percent (80/222). No malignant tumors were reported, and the increase of adenomas was not significant at the 0.05 level.

The first unequivocal data showing a relationship between asbestos inhalation and malignancy was that of Gross, et al. (1967) who observed carcinomas in rats exposed to a mean concentration of 86 mg/m^3 chrysotile for 30 hours/week from the age of six weeks. Of 72 rats surviving for 16 months or longer, 19 developed adenocarcinomas, 4 developed squamous cell carcinomas, and 1, a mesothelioma. No malignant tumors were found in 39 control animals. A search was made for primaries at other sites which could have metastasized. None were found. These and other data are summarized in Table 12.

Reeves, et al. (1971) found two squamous cell carcinomas in 31 rats sacrificed after two years following exposure to about 48 mg/m^3 of crocidolite. No malignant tumors were reported in rabbits, guinea pigs, hamsters, or in animals exposed to similar concentrations of chrysotile or amosite. No details of the pathological examinations were given.

In a later study (Reeves, et al. 1974), malignant tumors developed in 5 to 14 percent of the rats surviving 18 months. Lung cancer and mesothelioma were produced by exposures to amosite and chrysotile and lung cancer by crocidolite inhalation. Again, significant experimental details were lacking; information on survival times and times of sacrifice would have been useful. Available details of the exposures and results are given in Table 13. While the relative carcinogenicity of the fiber types was similar, it was noted that the fibrogenic potential of chrysotile, which had been substantially reduced in length and possibly altered (Langer,

TABLE 12

Summary of Experiments on the Effects of Inhalation of Asbestos

Animal species	Material administered	Dosage	Animals examined for tumors	Findings (malignant tumors)	Average survival time
			Gross, et al. (1967)		
132 male white rats	ball-and-hammer-milled Canadian chrysotile with/without 0.05 ml intratracheal 5% NaOH	42-146 mg/m^3 (mean conc., 86 mg/m^3) for 30 hrs/week	72	17 adenocarcinomas 4 squamous-cell sarcomas 7 fibrosarcomas 1 mesothelioma	not available
55 male white rats	controls with/without 5% NaOH	control	39	none	not available
			Reeves, et al. (1971)		
206 rats 106 rabbits 139 guinea pigs	ball-milled chrysotile, amosite, and	48±2 mg/m^3 for 16 hrs/week up to 2 yrs	not available	2 squamous-cell carcinomas in 31 animals from crocidolite exposure	no information periodic sacrifices were made
214 hamsters	crocidolite				
			Reeves, et al. (1974)		
219 rats	ball-and-	48±2 mg/m^3 for	120 rats	10 malignant tumors in rats	no information
216 gerbils	hammer-milled	16 hrs/week up	116 gerbils	2 in mice (See Table 13)	periodic sacrifices were made
100 mice 72 rabbits 108 guinea pigs	chrysotile, amosite, and crocidolite	to 2 yrs	10 mice 30 rabbits 43 guinea pigs		

TABLE 12
(continued)

Summary of Experiments on the Effects of Inhalation of Asbestos

Animal species	Material administered	Dosage	Animals examined for tumors	Findings (malignant tumors)	Average survival time
			Wagner, et al. (1974)		
13 groups of approx. 50 & 15 of about 25 Wistar SPF rats	amosite anthophyllite crocidolite Canadian chrysotile Rhodesian chrysotile (UICC samples)	10.1 to 14.7 mg/m^3 for 1 day to 24 months, 35 hrs/week	849	(See Tables 14 and 15) All asbestos varities produced mesothelioma and lung cancer, some from exposure as short as 1 day	669 to 857 days versus 754 to 803 for controls. Survival times not significantly affected by exposure.
			Wagner, et al. (1977)		
CO Wistar male & female rats	superfine chrysotile	10.8 mg/m^3 37.5 hrs/wk for 3, 6, or 12 months		1 adenocarcinomas of the lung in 24 animals exposed for 12 months	
CO Wistar male & female rats	non-fibrous cosmetic talc			none	
			Davis, et al. (1978)		
46 groups of approx. Han SPF rats and 20 Han SPF rats	UICC samples of amosite chrysotile crocidolite	2 mg/m^3 and 10 mg/m^3 35 hours/wk for 224 days	208	7 adenocarcinomas 3 squamous-cell sarcomas 1 pleural mesothelioma 1 peritoneal mesothelioma (See Table 16)	not available sacrificed at 29 months
20 Han SPF rats	control	control	20	none	

TABLE 13

Experimental Inhalation Carcinogenesis[a]

Fiber	Exposure		Rats		Mice	
	mass[b] (mg/m^3)	fiber[b] (f/ml)	Animals examined	Malignant tumors	Animals examined	Malignant tumors
Chrysotile	47.9	54	43	1 lung papillary carcinoma 1 lung squamous-cell carcinoma 1 pleural mesothelioma	19	none
Amosite	48.6	864	46	2 pleural mesotheliomas	17	none
Crocidolite	50.2	1105	46	3 squamous-cell carcinomas 1 adenocarcinoma 1 papillary carcinoma - all of the lung	18	2 papillary carcinomas of bronchus
Controls			5	none	6	1 papillary carcinoma of bronchus

[a] Reeves, et al. (1974)

[b] The asbestos was comminuted by vigorous milling, after which 0.08% to 1.82% of the airborne mass was of fibrous morphology (3:1 aspect ratio) by light microscopy.

et al. 1977) by milling, was much less than that of the amphiboles. These results were also discussed in a later paper by Reeves (1976).

In an extensive series of experiments, Wagner, et al. (1974) exposed groups of Wistar SPF rats to the five UICC asbestos samples at concentrations from 10 to 15 mg/m^3 for times ranging from 1 day to 24 months. For all exposure times there were 50 adenocarcinomas, 40 squamous-cell carcinomas and 11 mesotheliomas produced. None appeared prior to 300 days from first exposure. Considerable experimental detail is provided in the paper. The significant data are presented in Tables 14 and 15, and Figure 3 shows the dose-response data for lung carcinomas. These tumors follow a reasonably good linear relationship for exposure times of three months or greater. The incidence in the one-day exposure group, however, is considerably greater than expected. It was noted that exposure had a limited effect on length of life. Average survival times varied from 669 to 857 for exposed animals versus 754 to 803 for controls. The development of asbestosis was also documented. The incidence of lung cancer was found to be greater in animals surviving 600 days. There were 17 lung tumors, 6 in animals with no evidence of asbestosis and 11 in rats with minimal or slight asbestosis. Cancers at extrapulmonary sites were also listed. Seven malignancies of ovary and eight of male genito-urinary organs were observed in groups of approximately 350 rats. None were observed in groups of 60 male and female controls. Incidence of malignancy at other sites

TABLE 14

Number of Rats with Lung Tumors or Mesotheliomas After Exposure to Various Forms of Asbestos Through Inhalation[a]

Form of asbestos	No. of animals	Adenocarcinomas	Squamous-cell carcinomas	Mesotheliomas
Amosite	146	5	6	1
Anthophyllite	145	8	8	2
Crocidolite	141	7	9	4
Chrysotile (Canadian)	137	11	6	4
Chrysotile (Rhodesian)	144	19	11	0
None	126	0	0	0

[a] From Wagner, et al. (1974)

TABLE 15

Numbers of Rats with Lung Tumors or Mesotheliomas After Various Lengths of Exposure to Various Forms of Asbestos Through Inhalation[a]

Length of exposure	No. of animals	No. with lung carcinomas	No. with pleural mesotheliomas	% of animals with tumours
None	126	0	0	0.0
1 day	219	3[b]	2[c]	2.3
3 months	180	8	1	5.0
6 months	90	7	0	7.8
12 months	129	35	6	31.8
24 months	95	37	2	41.0

[a] Wagner, et al. (1974)
[b] 2 exposed to chrysotile and 1 to crocidolite
[c] 1 exposed to amosite and one to crocidolite

was little different from that of controls. If controls are included from other experiments in which ovarian and genito-urinary tumors were present, the comparative incidence in the exposure groups here lacks significance. No data were provided, however, on the variation of tumor incidence at extrapulmonary sites with asbestos dosage.

Wagner, et al. (1977a) also compared effects of inhalation of a superfine chrysotile to a pure, non-fibrous talc. One adenocarcinoma was found in 24 rats exposed to 10.8 mg/m^3 of chrysotile for 37.5 hours/week for 12 months.

Finally, in a study similar to Wagner's, Davis, et al. (1978) exposed rats to 2.0 or 10.0 mg/m^3 of chrysotile, crocidolite, and amosite (equivalent to from 430 to 1950 f/ml). Adeno- and squamous-cell carcinomas were observed in chrysotile exposures, but not with crocidolite or amosite (see Table 16). One pleural mesothelioma was observed with crocidolite exposure, and extrapulmonary neoplasms included a peritoneal mesothelioma. A relatively large number of peritoneal connective-tissue malignancies were also observed, including a leiomyofibroma on the wall of the small intestine. The significance of these tumors is speculative, however.

As discussed in the "Pharmacokinetics" section, inhalation exposures result in concomitant gastrointestinal exposures from the asbestos that is swallowed after clearance from the bronchial tree. While all inhalation experiments focussed on thoracic tumors, those of Wagner, et al. (1974), Davis, et al. (1978) and, to a limited extent, Gross, et al. (1967)

TABLE 16

Experimental Inhalation Carcinogenesis in Rats[a]

	Exposure		Number of	Fiber
	mass (mg/m^3)	fiber (f 5 u/ml)	animals examined	Malignant tumors
Chrysotile	10	1950	40	6 adenocarcinomas 2 squamous-cell carcinomas
Chrysotile	2	390	42	1 squamous-cell carcinoma 1 peritoneal mesothelioma
Amosite	10	550	43	none
Crocidolite	10	860	40	none
Crocidolite	5	430	43	1 pleural mesothelioma
Control			20	none

[a] Davis, et al. (1978)

also included a search for tumors at extrathoracic sites. A limited number of these were found, but no association can be made with asbestos exposure.

One aspect of the inhalation experiments that is noteworthy is the significant number of pulmonary neoplasms that can be produced in the rat by inhalation as compared to other species (Reeves, et al. 1971; Reeves, et al. 1974). This points to the variability of species response to asbestos and the need for an appropriate model before extrapolations to man can be made with confidence. The absence of significant gastrointestinal malignancy from asbestos exposure in animals, in contrast to that found in humans, may be the result of the use of inappropriate animal models.

Intrapleural Administration: Evidence that intrapleural administration of asbestos would result in mesothelioma was forthcoming in 1970 when Donna (1970) produced mesotheliomas in Sprague-Dawley rats treated with a single dose of 67 mg of chrysotile, amosite or crocidolite. Reeves, et al. (1971) produced mesothelial tumors in rats (1 of 3 with crocidolite and 2 of 12 with chrysotile) by intrapleural injection of 10 mg of asbestos. Two of thirteen rabbits injected with 16 mg of crocidolite developed mesotheliomas.

Stanton & Wrench (1972), in a series of experiments, demonstrated that major commercial varieties of asbestos, as well as various other fibers, produced mesotheliomas in as many as 75 percent of animals into which material had been surgically implanted. Extension of these experiments were reported in 1973 (Stanton, 1973). These results are summarized in Table 17. The authors concluded that the carcinogenicity of asbestos and other fibers is strongly related to their physical size, those fibers of a diameter less than 3 um being carcinogenic and those of a larger diameter not. Further, samples treated by grinding in a ball mill to produce shorter length fibers were less likely to produce tumors. While the authors attributed the reduced carcinogenicity to a shorter fiber length, the question has been raised as to the effect of the destruction of crystallinity and perhaps other changes in the fibers occasioned by the extensive ball milling (Langer, et al. 1977).

Another comprehensive set of experiments was conducted by Wagner (Wagner, et al. 1973; Wagner, et al. 1977b). He, too, has produced mesothelioma from intrapleural administration of asbestos to CD Wistar rats and demonstrated a strong dose-response relationship. Tables 18a and 18b list the results of these experiments.

Pylev and Shabad (1973) and Shabad, et al. (1974) reported mesotheliomas in 18 of 48 and in 31 of 67 rats injected with three doses of 20 mg of Russian chrysotile. Other experiments by Smith and Hubert (1974) have produced mesotheliomas in hamsters injected with 10 to 25 mg of chrysotile, 10 mg of amosite or anthophyllite, and 1 to 10 mg of crocidolite.

Various suggestions have been made that natural oils and waxes contaminating asbestos fibers might be related to their carcinogenicity (Harington, 1962; Harington and Roe, 1965; Commins and Gibbs, 1969). This, however, was

TABLE 17

Dose-response Data Concerning the effects of Intrapleural Implantation of Asbestos and Other Fibers in Rats[a]

Material	Dose (mg)	No. of rats with mesotheliomas	Total no. of rats	% of rats with tumors
UICC-SRAS crocidolite	1	2	25	8
	2	5	23	22
	10	11	27	41
	20	12	25	48
	40	14	23	61
Hand-cobbed virgin crocidolite	1	4	30	13
	20	10	24	42
	40	18	27	67
Special South African crocidolite	40	15	20	75
Partically pulverized crocidolite	40	8	25	32
UICC-SRAS amosite	40	15	25	60
UICC-SRAS chrysotile	40	15	26	58
Coarse fibrous glass	40	1	24	4
Glass wool	40	1	25	4
Fine AAA fibrous glass 3u diameter				
uncoated	40	3	26	12
coated	40	5	28	18

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[a] Stanton and Wrench, 1972

TABLE 18a

Percentage of Rats Developing Mesotheliomas After Intrapleural Administration of Various Materials[a]

Material	% of rats with mesotheliomas
SFA chrysotile (superfine Canadian sample)	66
UICC crocidolite	61
UICC amosite	36
UICC anthophyllite	34
UICC chrysotile (Canadian)	30
UICC chrysotile (Rhodesian)	19
Fine glass fiber (code 100), median diameter, 0.12 um	12
Ceramic fiber, diameter, 0.5-1 um[b]	10
Glass powder	3
Coarse glass fiber (code 110), median diameter, 1.8 um	0

[a] Wagner, et al. (1977b)
[b] Wagner, et al. (1973)

TABLE 18b

Dose-Response Data Following Intrapleural Administration of Asbestos to Rats[a]

Material	Dose (mg)	No. of rats with mesotheliomas	Total no. of rats	% of rats with tumors	Reference
SFA chrysotile	0.5	1	12	8	Wagner, et al (1973)
	1	3	11	27	
	2	5	12	42	
	4	4	12	33	
	8	8	12	62	
Crocidolite	0.5	1	11	9	
	1	0	12	0	
	2	3	12	25	
	4	2	13	15	
	8	5	11	45	

[a] Wagner, et al. (1973)

not borne out in the experiments described above by Wagner, et al. (1973) or Stanton & Wrench (1972).

Intratracheal Injection: Intratracheal injection has been used to study the combined effect of administration of chrysotile with benzo(a)pyrene in rats or hamsters (see "Synergism and/or Antagonism"). In rats given three doses of 2 mg chrysotile (Shabad, et al. 1974) or hamsters given 12 mg of chrysotile (Smith, et al. 1970) no lung tumors were observed. However, the co-administration of benzo(a) pyrene did result in lung tumors.

Intraperitoneal Administration: Intraperitoneal injections of 20 mg of crocidolite or chrysotile produced three peritoneal mesotheliomas in 13 Charles River CD rats. Twenty mg of amosite produced no tumors in a group of 11 (Maltoni & Annoscia, 1974). They also injected 25 mg of crocidolite into 50 male and 50 female 17-week old Sprague-Dawley rats and observed 31 mesothelial tumors in males and 34 in females.

In an extensive series of experiments, Pott and Friedrichs (1972) and Pott, et al. (1976) produced peritoneal mesotheliomas in mice and rats injected with various commercial varieties of asbestos and other fibrous material. These results are shown in Table 19. As with the experiments with intrapleural administration, the malignant response was altered by ball-milling fibers for 4 hours. The rate of tumor production was reduced from 55 percent to 32 percent and the time from onset from exposure to first tumor was lengthened from 323 to 400 days following administration of four doses of 25 mg of UICC Rhodesian chrysotile. In

Table 19

Tumors in Abdomen and/or Thorax After Intraperitoneal Injection of Glass Fibers, Crocidolite or Corundum in Rats[a]

Dust	Form[b]	I.p. dose (mg)	Effective number of dissected rats	No. of days before first tumor	Average survival time of rats with tumors (days after injection)	Rats with tumors (%)	Tumor type					
							Mesothelioma	Spindle-cell sarcoma	Polym-cell sarcoma	Carcinoma	Reticulum-cell sarcoma[c]	Benign[c]
Glass fibers MN 104	f	2	73	421	703	27.4	17	3	-	-	1	1
Glass fibers MN 104	f	10	77	210	632	53.2	36	4	-	1	3	-
Glass fibers MN 104	f	2 x 25	77	194	367	71.4	47	6	2	-	-	-
Glass fibers MN 112	f	20	37	390	615	37.8	12	1	-	1	-	1
Crocidolite	f	2	39	452	761	38.5	12	3	-	-	2	1
Corundum	g	2 x 25	37	545	799	8.1	1	-	-	2	2	2

Table 19 (cont.)

Dust	Form[b]	I.p. dose (mg)	Effective number of dissected rats	No. of days before first tumor	Average survival time of rats with tumors (days after injection)	Rats with tumors (%)	Tumor type					
							Mesothelioma	Spindle-cell sarcoma	Polym-cell sarcoma	Carcinoma	Reticulym-cell sarcoma	Benign[c]
UICC Rhodesian chrysotile	f	2	37	431	651	16.2	4	2	-	-	1	-
UICC Rhodesian chrysotile	f	6.25	35	343	501	77.1	24	3	-	-	-	-
UICC Rhodesian chrysotile	f	25	31	276	419	80.6	21	2	1	1	-	-
UICC Rhodesian chrysotile	f	4 x 25	33	323	361	54.5	16	2	-	-	-	-
UICC Rhodesian chrysotile	f	3 x 25 s.c.	33	449	449	3.0	-	-	1 s.c.	-	-	-
UICC Rhodesian milled	f	4 x 25	37	400	509	32.4	9	3	-	-	-	-
Palygorscite	f	3 x 25	34	257	348	76.5	24	2	-	-	-	-
Glass fibers s + s 106	f	2	34	692	692	2.9	1	-	-	-	-	-
Glass fibers S + S 106	f	10	36	350	530	11.1	2	2	-	-	1	-

Table 19 (cont.)

Dust	Form^b	I.p. dose (mg)	Effective number of dissected rats	No. of days before first tumor	Average survival time of rats with tumors (days after injection)	Rats with tumors (%)	Tumor type					
							Mesothelioma	Spindle-cell sarcoma	Polym-cell sarcoma	Carcinoma	Reticulum-cell sarcoma	Benign^c
Glass fibers S + S 106	f	4 x 25	32	197	325	71.9	20	3	-	-	-	-
Gypsum	f	4 x 25	35	579	583	5.7	-	-	1	1	1	-
Henalite	f	4 x 25	34	249	315	73.5	17	8	-	-	-	-
Actinolite	g	4 x 25	39	-	-	-	-	-	-	-	-	-
Biotite	g	4 x 25	37	-	-	-	-	-	-	-	-	-
Haematite (precipit.)	g	4 x 25	34	-	-	-	-	-	-	-	-	-
Haematite (mineral)	g	4 x 25	38	-	-	-	-	-	-	-	-	-
Pectolite	g	4 x 25	40	569	569	2.5	-	-	-	1	1	1
Sanidine	g	4 x 25	39	579	579	2.6	-	1	-	-	-	-
Talc	g	4 x 25	36	587	587	2.8	1	-	-	-	-	-
NaCl (control)	-	4 x 2ml	72	-	-	-	-	-	-	-	-	-

the case of the ball-milled fiber, 99 percent were reported to be smaller than 3 um, 93 percent less than 1 um, and 60 percent less than 0.3 um.

A strong conclusion which can be drawn from the above experimental data is that large-diameter fibers (greater than 3 um) are significantly less carcinogenic than finer fibers. The origin of the reduced carcinogenicity of shorter, ball-milled fibers is less clear as the relative contributions of shorter fiber length and the significant alteration of the crystal structure by input of physical energy are not, as yet, defined. Further, the extrapolation of data developed on size-dependent effects, from intrapleural or intraperitoneal administration to inhalation (where movement of the fibers in airways and subsequently through body tissues is strongly size-dependent) presents significant difficulties. Finally, since the number of smaller fibers in an exposure circumstance may be 100 times greater than those longer than 5 um, the reduction of their carcinogenicity must be demonstrated at a level 100 times less before their contribution can be neglected.

Carcinogenicity - Human Data

The modern history of asbestos disease dates from the turn of the century, when two reports were published documenting uncontrolled conditions in asbestos textile factories. One, the testimony of H. Montague Murray (1907) at a hearing concerning compensation, described severe pulmonary fibrosis found at autopsy in 1900 in the last survivor of a group of ten workers first employed 14 years previously in a carding room. The second was the description by Auribault (1906) of deaths during the early years of operation of an asbestos weaving mill established at Conde-sur-Noireau, France, in 1890. During this period, 50 men died, including 16 of 17 recruited from a cotton textile mill previously owned by the factory director.

With time, however, the spectrum of disease associated with asbestos exposure continued to expand. In 1935 two clinical reports were published of lung cancer in asbestos workers who had died with evidence of pulmonary fibrosis (Lynch and Smith, 1935, Gloyne, 1935). While such reports were not sufficient to causally relate asbestos exposure to the lung cancer, the possibility was raised. In 1947 it was confirmed by substantial data which showed that 13 percent of a group of individuals who died with asbestosis in Great Britain also had bronchogenic carcinoma (Merewether, 1947). Mesothelioma, a rare tumor of the lining of the abdomen or chest, was first described in an asbestos worker in 1953 (Weiss, 1953) subsequently found to be frequently associated with potential asbestos exposure (Wagner, et al. 1960), and unequivocally related to such exposure in 1965 (Newhouse and Thomson, 1965). Gastrointestinal cancer also was found to be in excess among asbestos insulation workers in the United States (Selikoff, et al. 1964).

Currently, all major commercial asbestos varieties, chrysotile, amosite, and crocidolite, have been found to produce a significant incidence of asbestos-related disease among workers occupationally exposed in mining and milling, in manufacturing, and in the use of materials containing the fiber. The predominant route of exposure has been inhalation, although some asbestos may be swallowed directly or after being brought up from the respiratory tract. Not only has asbestos disease been found among individuals exposed to the fiber directly as a result of excessive work exposures in decades past, but asbestos-associated cancer has also been identified, albeit less frequently, among those with inhalation exposures of lesser intensity, including those who had worked near the application or removal of asbestos material, those with history of residing in the vicinity of asbestos plants, and those who had lived in the household of an asbestos worker.

Water Ingestion: Four studies have considered the relation of asbestos ingested in drinking water to gastrointestinal cancer. As an outgrowth of the contamination of Lake Superior by fibrous material in the tailings of an iron ore processing plant, the mortality of the population of Duluth was compared with that of Minnesota and Hennapin County (Minneapolis) for quinquenia to 1969 (Mason, et al. 1974). The relative death rates for digestive cancer, lung cancer and all neoplasm were elevated from 16 to 49 percent. However, with the exception of colon/rectal cancer, which was highly elevated, no trends with time or consistency between male and female were clearly discernable. Mason, et al. (1974) concluded that additional follow-up was necessary to determine if a hazard exists. Levy, et al. (1976) conducted a similar study with equivalent results. However, the short follow-up from the earliest possible exposure (1956) would make it unlikely that any positive result would be found. Furthermore, while the Reserve plant began production in 1956, current discharge levels did not begin until 1967 when a major plant expansion took place.

A study by Harrington, et al. (1978) reviewed malignancy in the Connecticut Tumor Registry from 1935 to 1973 to see if a correlation existed between the use of asbestos cement (A/C) pipe for public water supply and the incidence of gastrointestinal cancer. No association was found between the age-adjusted, sex-specific incidence data for stomach, colon, and rectal cancer and the use of A/C pipe. While some water supplies reported A/C pipe that was 45 years old in 1975, the majority (66 percent) of the population studied received water through A/C pipes that were only 25 years old. While the majority (56 percent) of A/C pipe systems in Connecticut have water which is considered aggressive under the AWWA Standard for A/C transmission and pressure pipe, fiber counts done on over 100 A/C pipe systems in Connecticut showed 98 percent to be under 10^6 f/l (J. Millette, personal communication).

A report on an EPA grant to the University of California analyzed the 1969-1971 cancer incidence from 721 census tracts of the five Bay Area Counties along with the chrysotile asbestos fiber concentrations in the drinking water (Cooper, et al. 1978). For the census tracts the chrysotile asbestos fiber counts ranged from below detectable limits to 36 x 10^6 fibers per liter.

The University of California investigators grouped the census tracts on a gradient of low- to high-asbestos counts and found significant dose-response gradients for the incidence of several cancers. Statistically significant positive trends were noted for white male lung and stomach cancer and white female gall bladder, esophageal, and peritoneal cancer. The census tracts were cross-classified using both asbestos count and tract socio-economic status indicators of medium family income and medium school years completed. The positive dose-response effect between cancer incidence of certain sites and asbestos counts appeared to be independent of the effect of socio-economic status. The fact that the significant results are not restricted to one body site is not surprising considering the knowledge that asbestos fibers are probably transported throughout the body. For example, one study using rats has found that ingested fibers are deposited in the lung. (Cunningham, et al. 1977). An additional study (Cooper, et al. 1979) using six years of data showed a statistically significant association between asbestos levels in Bay area, CA drinking water and cancers of the digestive tract.

Insulation Application and Removal: A large study by Selikoff, et al. (1979) best demonstrates the full spectrum of disease from asbestos exposure. They studied the mortality experience of 17,800 asbestos insulation workers from January 1, 1967, through December 31, 1976. These workers were exposed primarily to chrysotile prior to 1940, and to a mixture of chrysotile and amosite subsequently. No crocidolite is known to have been used in U.S. insulation material (Selikoff, 1970). In this group, 2271 deaths have occurred, and their analysis provides important insights into the nature of asbestos disease. Table 20 lists the expected and observed deaths by cause, and includes data on tumors less frequently found. As in animal experiments, lung tumors are common and account for about 20 percent of the deaths; 7 percent are from mesothelioma of the pleura or peritoneum. Additionally, though, cancer of the gastrointestinal tract is significantly elevated; so, too, are cancer of the larynx, pharynx, and buccal cavity, and renal tumors. Other tumors are also increased, but not to a statistically significant degree. Comparing the deaths from cancer and asbestosis in this group with those expected in the general population, nearly 40 percent of the deaths among insulators can be attributed to their occupational exposure to asbestos fiber.

The large number of deaths allows an analysis to be made of the onset of effects as related to time from first exposure. Figure 4 depicts the excess asbestos-related lung cancers and mesotheliomas according to time from onset of exposure. It is seen that an important rise in bronchogenic carcinoma occurs only after 25 years and mesothelioma, after 30 years. This long-lapsed period is seen in individuals exposed continuously to relatively high concentrations of asbestos. At lower exposures, longer periods from exposure onset to tumor development would be expected and, thus, studies that do not provide adequate follow-up can be misleading. Among other groups of insulation workers, high

TABLE 20

Deaths Among 17,800 Asbestos Insulation Workers in the United States and Canada

January 1, 1967 - January 1, 1977[a,b]

Number of men: 17,800
Man-years of observation: 166,853

	Expected	Observed	Ratio
Total deaths, all causes	1,660.96	2,271	1.37
Total cancer, all sites	319.90	994	3.11
Lung cancer	105.97	485	4.58
Pleural mesothelioma	--	66	--
Peritoneal mesothelioma	--	109	--
Cancer of esophagus	7.01	18	2.57
Cancer of stomach	14.23	22	1.55
Cancer of colon - rectum	37.86	59	1.56
Larynx	4.84	11	2.27
Pharynx, buccal cavity	8.58	21	2.45
Kidney	8.08	20	2.48
Cancer of pancrease	17.46	22	1.26
Liver, biliary passages	7.50	5	0.67
Bladder	9.34	8	0.86
Testes	1.95	2	--
Prostate	19.98	30	1.50
Leukemia	12.95	15	1.16
Lymphoma	20.21	19	0.94
Skin	6.58	12	1.82
Brain	10.34	14	1.35
All other cancer	27.02	56	2.07
Asbestosis	--	162	--
Chronic respiratory disease[c]	58.58	66	1.12
All other causes	1,282.48	1,049	0.82

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[a] Selikoff, et al. (1979)

[b] Expected deaths are based upon white male age specific mortality data of the U.S. National Center for Health Statistics for 1967-1975 and extrapolation to 1976.

[c] Other than asbestosis.

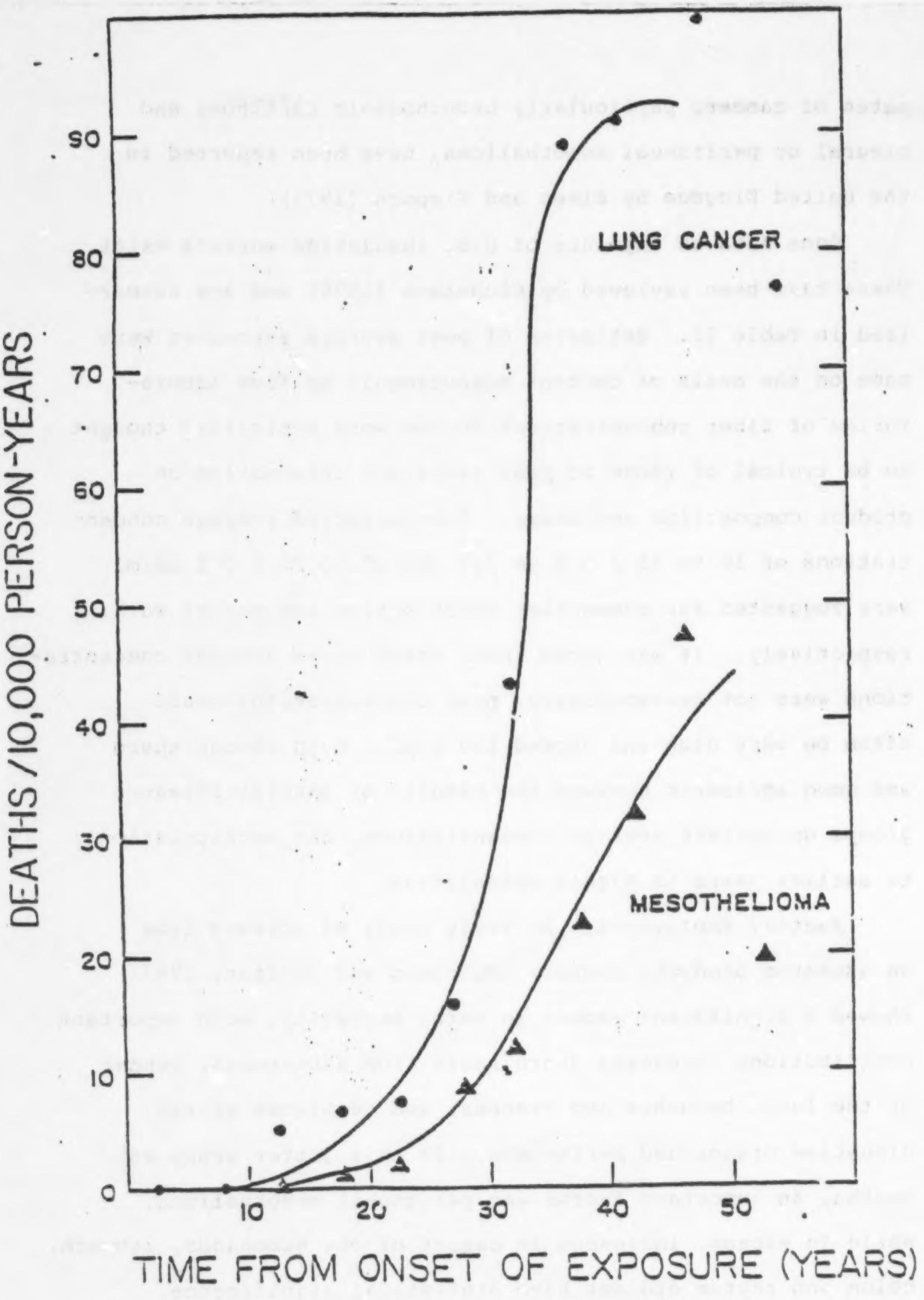

Figure 4. The excess, Asbestos-related Mortality Rates for Lung Cancer and Mesothelioma According to Time from Onset of Asbestos Disease.

rates of cancer, particularly bronchogenic carcinoma and pleural or peritoneal mesothelioma, have been reported in the United Kingdom by Elmes and Simpson (1971).

Some data on exposure of U.S. insulation workers exist. These have been reviewed by Nicholson (1976) and are summarized in Table 21. Estimates of past average exposures were made on the basis of current measurements by five laboratories of fiber concentrations during work activities thought to be typical of those of past years and information on product composition and usage. Time-weighted average concentrations of 10 to 15 f $>$ 5 um /ml and 15 to 20 f $>$ 5 um/ml were suggested for commercial construction and marine work, respectively. It was noted that, while these average concentrations were not extraordinary, peak concentrations could often be very high and exceed 100 f/ml. Even though there was good agreement between the results of several research groups on current average concentrations, the extrapolation to earlier years is highly speculative.

Factory Employment: An early study of workers from an asbestos products factory (Mancusco and Coulter, 1963) showed a significant excess in total mortality, with important contributions to excess death rates from asbestosis, cancer of the lung, bronchus and trachea, and neoplasms of the digestive organs and peritoneum. In this latter group of deaths, an important factor was peritoneal mesothelioma. While in excess, increases in cancer of the esophagus, stomach, colon and rectum did not have statistical significance.

TABLE 21

Summary of Average Asbestos Air Concentrations during Insulation Work

Research group	Average Fiber Concentration f/ml Light and heavy construction	Marine work
Average concentrations of fibers longer than 5 um evaluated by membrane filter techniques and phase-contrast microscopy		
Nicholson (1975)	6.3	
Balzer & Cooper (1968)	2.7	
Cooper & Balzer (1968)		6.6
Ferris, et al. (1971)		2.9
Harries (1971a,b)		8.9
Average concentrations of all visible fibers counted with a konimeter and bright-field microscopy		
Murphy, et al. (1971)		8.0
Fleischer, et al. (1946)		30-40
Estimates of past exposure based on current membrane-filter data		
Nicholson (1976)	10-15	

TABLE 22

Observed Deaths and SMRs for Selected Causes of Death by Period of Follow-Up for 1075 Males Retiring from a U.S. Asbestos Company from 1941-67 and Followed through 1973[a]

Cause of Death	1941-1973 Observed deaths	1941-1973 SMR	1941-1969 Observed deaths	1941-1969 SMR	1970-1973 Observed deaths	1970-1973 SMR
All causes	781	120.4	616	115.8	165	141.6
Cancer (140-205)[b]	173	159.0	138	154.5	35	179.5
Digestive (150-159)	55	137.8	46	136.1	9	147.5
Respiratory (162-163)	63	270.4	49	270.7	14	269.2
All other cancers	55	120.6	43	115.0	12	146.3
Stroke (330-334)	74	96.4	48	76.7	26	183.1
Heart disease (400-443)	321	106.5	269	108.4	52	97.7
Respiratory disease (470-527)	68	173.0	54	178.2	14	155.6
Pneumoconiosis and pulmonary fibrosis (523-525)	31	--	25	--	6	--
Asbestosis (523.2)	19	--	16	--	3	--
All other causes	113	92.5	96	94.6	17	82.5
Death certificates not located	32	--	11	--	21	--

[a] Enterline, et al. (1972)

[b] Disease code

There was a consistent increase in the mortality rate with increasing length of employment in the asbestos industry for all causes of death and especially for malignant neoplasms and asbestosis.

A second study of factory employees is that of Enterline, et al. (Enterline, et al. 1972; Henderson and Enterline, 1978), who studied a group of retirees from several plants of a major asbestos products manufacturing company. It shows a similar pattern of mortality. Table 22 lists standard mortality rates (SMR's) by cause in two time periods. The usual asbestos cancers and asbestosis are seen as significant causes of death. Here, too, a correlation was found between total dust exposure and excess mortality for both malignant and non-malignant disease. Table 23 lists the data for lung cancer and shows a linear relationship with exposure.

TABLE 23

Lung Cancer Mortality Rates According to Dust Exposure[a]

Cumulative dust exposure (mppcf[b] - years)	SMR
125	197.9
125 - 149	180.0
250 - 499	327.6
500 - 749	450.0
750	777.8

[a] Henderson and Enterline (1978)

[b] Million particles per cubic foot

These authors (Enterline and Henderson, 1973) suggested earlier that crocidolite may have a higher carcinogenic potential (for lung) than amosite or chrysotile. The later analysis (Henderson and Enterline, 1978) shows that individuals in the textile departments of the company (chrysotile only) have a lower lung cancer SMR than those in the pipe department (chrysotile and crocidolite) for equal dust exposures. However, no conclusions could be drawn from an analysis of the mortality rates of all individuals exposed, or not exposed, to crocidolite. Since the follow-up of this population began only after the cohort members reached age 65, survivor effects may be of importance. For example, those individuals who smoke cigarettes and are thus at higher risk for lung cancer may be preferentially excluded by virtue of death before age 65 because of smoking-associated disease such as myocardial infarction. Further, the limited number of mesotheliomas (5 of 781 deaths) found in the latest follow-up of this group could be due to the high incidence of mesothelioma at age 50 to 65, 30 to 45 years from onset of first employment (see Figure 4).

A study of the largest factory of the company studied by Enterline, et al. (1972), but not limited to retirees, shows a considerably different mortality pattern (Nicholson, 1976; Nicholson, et al. 1979a). All 689 maintenance and production employees on January 1, 1959, who were first employed at least 20 years earlier were followed through 1976. In this group, 274 deaths occurred, whereas 188.19

were expected. Fourteen pleural and 12 peritoneal mesotheliomas accounted for nearly 10 percent of the deaths, most occurring before age 65. A strong correlation with estimated dust exposure was seen in deaths from asbestosis, but not with the asbestos-related malignancies. Gastrointestinal cancer was especially high in the lowest of four dust categories (11 observed versus 3.15 expected) and only elevated slightly in the higher exposure categories. In the highest dust category, the textile mill, cancer was not dramatically increased, but 40 percent of the deaths were from asbestosis. Individuals in this department tended to die of non-malignant disease before reaching the age of greatest risk for cancer.

A final significant U.S. factory study is that of Seidman, et al. (1979) which extends an earlier study (Selikoff, et al. 1972) and documents the experience of workers exposed only to amosite asbestos in the production of insulation materials, primarily for use aboard naval vessels. Overall mortality shows patterns similar to other heavily exposed groups, with 594 deaths observed versus 368.62 expected. Lung cancer was more than five times the number expected, and 16 deaths from mesothelioma occurred. Of particular importance in this study is the finding that individuals employed for periods less than 6 months had significant excess of lung cancer (see Table 24). Gastrointestinal cancer was also elevated for those with exposures of less than 6 months (15 observed versus 10.6 expected), but the difference did not have statistical significance. Further, there was not an increasing risk with time of employment as in the case with lung cancer.

TABLE 24

Expected and Observed Deaths from Lung Cancer and Cancer of the Esophagus, Stomach, Colon and Rectum in Workers Exposed to Amosite Asbestos (Followed 5 to 35 Years after Employment from 1941 to 1945)[a]

Length of employment	Lung cancer expected	Observed	GI cancer expected	Observed
1 mo	1.6	4	1.4	2
1 mo	2.5	6	2.4	2
2 mo	2.4	8	2.6	3
3-5 mo	4.2	9	4.2	8
6-11 mo	3.2	12	3.2	1
1 yr	2.6	15	2.5	5
2+ yrs	6.0	39	6.4	7
Total	22.5	93	22.7	28

[a] Seidman, et al. (1979)

Some data exist that would indicate the air concentrations to which workers in this factory, which operated in Paterson, New Jersey, from 1941 through 1954, were exposed. Following cessation of operations there, two similar plants were opened elsewhere, using the same equipment and manufacturing the same product with the same materials. As in the Paterson factory, dust control was inadequate in the newer plants. These continued operation through 1971 in one case and 1975 in the second. During 1967, 1970, and 1971 asbestos fiber concentrations in the plants were measured by the National Institute for Occupational Safety and Health (NIOSH, 1972), and the results are presented in Table 25. The overall arithmetic average exposure was 34.9 f/ml with

TABLE 25

Asbestos Fiber Concentrations in Two Amosite Insulation Production Facilities[a,b]

ASBESTOS INSULATION PLANT Y

	1967		1970		1971	
Operation	Mean	No. of samples	Mean	No. of samples	Mean	No. of samples
Mixing	107.0	3	27.7	2	46.3	7
Forming	98.9	12	24.1	13	25.2	32
Finishing	32.2	4	16.8	2	15.0	17
Inspection & Packing	13.3	2	13.0	8	11.0	19
Miscellaneous			21.0	14	2.7	5

ASBESTOS INSULATION PLANT X

	1967		1970		1971	
Operation	Mean	No. of samples	Mean	No. of samples	Mean	No. of samples
Mixing	163.0	5	36.2	3	74.4	11
Forming	33.3	18	25.7	3	50.6	39
Curing	2.5	1	31.0	1	14.4	5
Finishing	44.6	3	34.8	4	39.5	26
Inspection & Packing	16.7	7	17.9	3	22.8	15
Miscellaneous			13.8	2	16.6	24

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[a] NIOSH (1972)

[b] All samples expressed as f >5 um/ml.

a range from about 20 to 80. Using 40 f/ml, as an estimate of the fiber count in the Paterson factory, one calculates the average dose received by those employed for less than 6 months to be no more than 120 f/ml-months, the same dose as would be received by a worker employed 20 years at an exposure of 0.5 f/ml. Of significance, also, is that the mesothelioma risk is less than that of insulators (3 percent versus 7 percent). Since times from onset of exposure to amosite are comparable for each group, the presence of amosite in insulation materials cannot explain the high rate of mesothelioma among insulators.

In Great Britain, a well-studied factory population (Doll, 1955; Knox, et al. 1968) provides useful information because of the availability of environmental information. The mortality experience of this group has been recently updated (Peto, et al. 1977). Workers exposed prior to 1933 (before dust concentrations were significantly reduced) had a marked excess of lung cancer (25 observed versus 4.63 expected). Other cancers were elevated, but not greatly so. Of significance, however, individuals employed after 1933, and even after January, 1951, were found to have an excess risk of lung cancer. These data were analyzed by Peto (1978) in relation to measured and estimated fiber concentrations. Exposures averaged about 10 f/ml after 1933 and were virtually exclusively chrysotile. Using a linear dose-response relationship for lung cancer and pleural mesothelioma, he estimated that a 2 f/ml exposure for 50 years would cause approximately 10 percent of male asbestos workers to die from asbestos-related disease. It should be noted that data available for analysis were very limited and the estimate was based on extremely small numbers (14 deaths from lung cancer, 4 from mesothelioma, and 17 from non-malignant respiratory disease). Furthermore, few individuals in the cohort were more than 35 years from onset of exposure and at a period of highest risk from asbestos disease.

Another factory population has been extensively studied (Newhouse, 1969; Newhouse, et al. 1972; Newhouse and Berry, 1976; Newhouse and Berry, 1979). Exposures were to chrysotile, crocidolite and amosite. Table 26 lists the mortality experience of both men and women according to estimates of fiber exposure (no details are provided as to the method of estimation) (Newhouse and Berry, 1979). Lung cancer, gastrointestinal cancer and mesothelioma are significantly elevated in the long-term (2 years) or severe exposure groups. It has been estimated (Newhouse and Berry, 1976) that as much as 11 percent of this entire group will die of pleural or peritoneal mesothelioma. Among women, cancer of the breast and cancer of the ovary were in excess at the 0.05 level of significance.

Mining and Milling: Three studies exist showing mortality patterns in the mining and milling of pure chrysotile asbestos. Among Canadian mine and mill employees a strong correlation with total dust levels and lung cancer and gastrointestinal cancer is seen. In studies of McDonald, et al. (1971) and McDonald and Liddell, (1979) excess respiratory cancer was seen and strongly correlated with dust index for individuals

TABLE 26

Mortality Experience of Male and Female Factory Workers[a]

Exposure (male)

Cause of Death	Low to moderate (5-10 f/ml)				Severe (20+ f/ml)			
	2 yrs		2 yrs		2 yrs		2 yrs	
Exposed Individuals:	884		554		937		512	
	O	E	O	E	O	E	O	E
All causes	118	118.0	89	95.3	162[d]	122.2	176[d]	102.5
Cancer of lung & pleura (ICD 162 -163)[e]	17	11.01	16	9.0	31[d]	12.8	56[d]	10.4
G I cancer (ICD 150-158)	10	9.0	9	7.3	20[c]	9.5	19[c]	8.2
Other cancers	6	7.4	8	5.8	16[c]	7.9	16[c]	6.3
Chr resp disease	19	17.5	16	14.7	20	17.6	28	15.9

Exposure (female)

Cause of death	Low to moderate (5-10 f/ml)		Severe (20+ f/ml)			
			2 yrs		2 yrs	
Exposed Individuals:	98		396		199	
	O	E	O	E	O	E
All causes	34[b]	22.0	88[c]	65.6	78[d]	30.4
Cancer of lung & pleura (ICD 162-163)	3[b]	0.5	15[d]	1.9	21[d]	0.8
G I cancer (ICD 150-158)	3	1.9	14[c]	5.7	9[c]	2.6
Other cancers	4	3.2	16	11.9	16[d]	5.3
Chr resp disease	3	2.3	6	6.8	10[c]	3.2

[a] Newhouse and Berry (1979)

[b] P = 0.05

[c] P = 0.01

[d] P = 0.001

[e] Disease codes

with 20 or more years employment, with a linear relationship to dust exposure in mppcf-years providing the best fit (McDonald and Liddell, 1979) (see Table 27).

TABLE 27

Relative Risks for Respiratory Causes

Dust index (mppcf-yrs)	10	10-99	100-299	300-599	600
Relative risk	1.0	1.1	1.2	1.8	2.9

[a]McDonald and Liddell (1979)

These data, however, only compare various exposed groups. In the initial publication of the mortality experience of this cohort, it was seen that all dust categories had a higher respiratory cancer rate than the rate of the neighboring counties (McDonald, et al. 1971). Further, the use of a dust index makes it difficult to separate time and intensity of exposure (both of which, as seen, have considerable prognostic influence), and it is not directly convertible into fiber concentrations (Gibbs and LaChance, 1974). High exposure categories also showed an excess risk of cancer of the stomach and esophogus. Mesothelioma was verified as the cause of 15 of 4,547 deaths, a rate much less than reported in factory populations.

Separation of time and intensity is to some extent achieved in a study by Nicholson (1979a), also of Canadian mine and mill employees, all of whom had at least 20 years from first exposure to asbestos at the time of enrollment.

Asbestosis (14 percent of all deaths) and lung cancer (28 observed versus 11.1 expected) were the major sources of excess mortality. One death (of 174) was from pleural mesothelioma.

A Soviet study of the health effects of chrysotile mining and milling is that of Kogan (1972). Overall excess mortality of cancer of the respiratory or digestive tract was seen, particularly in the groups aged 50 years or older (and presumably 30 or more years from first exposure). Among these, stomach cancer mortality in male miners is increased 2.5 times and that of female workers by 3.6 times. The corresponding increases for female and male mill workers are 4.3 and 19.9 times expected. Additionally, intestinal cancer is elevated among the 50+ year group 4.3 times for male miners, 6.9 times for female miners and 14.3 for women mill employees. Unfortunately, data on the number of deaths are not provided. No cases of mesothelioma are reported.

Anthophyllite mining has also been found to produce a high risk of bronchogenic carcinoma (Meurman, et al. 1974). In a study of miners exposed to fibers of cummingtonite-grunerite ore series (in which amosite is formed), Gillam, et al. (1976) reported excess malignant respiratory disease (10 observed versus 2.7 expected) at an average air concentration of 0.25 f/ml.

No cohort mortality studies exist for the mining or milling of crocidolite or amosite.

In the above studies of chrysotile mining and milling, mesothelioma was present to much less a degree than in the following three instances: a factory using chrysotile exclusively, (four percent of 20+ year employees) (Peto, 1978); the largest U.S. chrysotile using facility (ten percent) (Nicholson, 1979); or insulation work using chrysotile and amosite (seven percent) (Selikoff, et al. 1979). It appears that as the fibers are manipulated through milling, processing, and use, their carcinogenic potential increases. Whether this is related to a reduction in fiber size or other factors is yet to be definitively established, particularly in view of animal data which indicates a reduction in carcinogenic potential following ball-milling (see "Animal Inhalation" section).

Because of its relevance to ingestion, a summary of the available data on gastrointestinal cancer and peritoneal mesothelioma is given in Table 28.

Indirect Occupational Asbestos Exposure: In 1968 it was pointed out by Harries (1968) that shipyard workers other than insulators were at risk from asbestos disease. Among Devonport Dockyard employees, five cases of mesothelioma were found among men who had not been "asbestos workers" but had followed other trades in the yard. These men presumably had been inadvertently exposed to asbestos merely by working in the same shipyard areas where asbestos had been used. Continuing to follow this group, Harries later documented 55 cases of mesothelioma in this shipyard alone, only two of which occurred in asbestos workers (Harries, 1976); and one, a man who had previously sprayed asbestos. A study of the distribution of all verified cases of meso-

TABLE 28

Gastrointestinal Cancer in Occupationally Exposed Asbestos Workers

Reference	Years of observation	Causes of death (ICD)[a]	Expected deaths	Observed deaths	Excess deaths	SMR	Number of peritoneal mesothelioma
		INSULATION WORKERS					
Selikoff, et al. (1979)	1967-77	150-154	59.10	99	39.9	168	109
Selikoff, et al. (1976)	1943-74	150-154	13.63	43	29.4	315	22
Kleinfeld, et al. (1967)	1945-65	150-159				390[c]	
Elmes and Simpson (1971)	1940-66	150-154	4	12	8+	300+	3
		FACTORY WORKERS					
Henderson and Enterline (1979)	1941-74	150-159	40.1	55	15.1	137.8	few
Nicholson, et al. (1979b)	1959-76	150-154	7.99	15	7.0	188	12
Seidman, et al. (1979) (amosite only)	to 1977	150-154	21.55	32	10.5	149	8
Newhouse and Berry (1979) low-mod. exposure	to 1975	150-158 (excluding mesothelioma)	18.2	18	15.8	99	5
severe exposure			26.0	42	16.0	162	30
		MINING AND MILLING					
McDonald and Liddell (1979) "heavy exposures"	to 74	150-151				289[b]	few
Kogan, et al. (1972) age 50+ male miners		150				250[b]	
male millers						430	none reported
female miners						360	
female millers						1990	

[a] Disease codes

[b] no information on number of deaths

[c] proportionate mortality

thelioma found in Scotland between the years of 1950 and 1967 is also revealing. Of 89 cases available for study, 55 were in shipyard employees, dockers or naval personnel. Of the 55, again only one was an asbestos insulation worker (McEwen, et al. 1977).

A study by Edge (1976) of men who had worked in a shipyard in Barrow, England, attempted to establish a risk of low-level asbestos exposure on a population basis. He selected 235 shipyard workers with pleural plaques but no parenchymal fibrosis on x-ray, and followed their mortality experience from 1970 through 1973. Seventy died, 17 of mesothelioma and 13 from lung cancer, 2.6 times expected. However, the relevance of these data have been called into question by the possibility of bias in the selection of the 235 cases (Edge, 1979).

The previously mentioned radiological evidence (see "Indirect Occupational Asbestos Exposure" section) that asbestos concentrations in general shipyard work (Selikoff, et al. 1979) or maintenance activities in a chemical factory (Lilis and Selikoff, 1979) are sufficient to produce fibrosis points to the existence of a widespread carcinogenic problem from indirect asbestos exposures.

Environmental Asbestos Disease: Wagner, et al. (1960) reviewed 47 cases of mesothelioma found in the Northwest Cape Province, South Africa in the previous five years. Of this number, roughly half the cases were in people who had worked with asbestos. Virtually all the rest were in individuals who had, decades before, simply lived or worked in an area of asbestos mining (one living along a roadway in which asbestos fibers were shipped). This germinal observation demonstrated that asbestos exposure of limited intensity, often intermittent, could cause mesothelioma. The hazard was further pointed out by the findings of Newhouse and Thomson (1965), who showed that mesothelioma could occur among people whose potential asbestos exposure consisted of their having resided near an asbestos factory or in households of asbestos workers. Twenty of 76 cases from the files of the London Hospital (1917 to 1964) were the result of such exposure; 31 were occupational in origin, and asbestos exposure was not identified for 25.

Synergism and/or Antagonism

Asbestos exposure and cigarette smoking have been found to act synergistically to produce dramatic increases in lung cancer over that from exposure to either agent alone. In a study by Hammond, et al. (1979) of 17,800 insulation workers, smoking histories on 11,656 were obtained during 1966 prior to prospective observation. Of these workers, 1,457 reported they had never smoked, 607 had smoked only a pipe and/or cigars, and 9,591 gave a history of cigarette smoking. No information was available from the remaining 6,143. Using data of the American Cancer Society on age and calendar year-specific cancer rates among smokers and non-smokers in a prospective study of more than 1,000,000 people in the United States, it was possible to make smoking-specific comparisons of the mortality experience of insulation workers with nonasbestos exposed-individuals in the general population. Table 29 lists the relative risk of death from lung cancer according to smoking habits and occupational exposure to asbestos. Those insulation workers who claimed never to have smoked cigarettes were found to have an increased risk of death from lung cancer compared with non-smokers in the general population, although there were relatively few deaths, eight observed versus 1.82 expected. However, among those with a history of cigarette smoking, the risk was also increased and its effect was large, 325 deaths being recorded versus 53.03 expected. Asbestos exposure appears to multiply the risk of death of lung cancer by four to six times, irrespective of smoking habits. When that risk is already high, as in cigarette smokers, the result is catastrophic. An earlier study by Selikoff, et al. (1968) indicated that the risk of death from lung cancer in cigarette smoking asbestos workers was 92 times that among individuals who were neither exposed to the fiber nor smoked cigarettes.

Cancers of the larynx, pharynx and buccal cavity and of the esophagus in insulators are also associated with cigarette smoking (Hammond, et al. 1979). Among 50 deaths due to tumors of these sites, none were among non-smokers and three were among individuals who smoked only pipes or cigars. Mesothelioma of the pleura or peritoneum and cancer of the stomach, colon and rectum, however, were unrelated to smoking habits. It is worth noting that in these studies by Selikoff and Hammond over 200 excess deaths occurred from peritoneal mesothelioma and gastrointestinal cancer

Table 29

Ratios of Observed to Expected[a] Deaths in Insulation Workers According to Smoking Habits, January 1, 1967 to December 31, 1976[b]

	No history of cigarette smoking	Current or past cigarette smokers
Control population	1.00	10.85
Asbestos insulation workers (number of deaths)	5.17 (8)	53.24 (325)
Ratio of asbestos workers to control population	5.17	4.90

---

[a] Expected deaths are calculated from observed age and smoking-specific rates of death of a control population of 73,763 white, male workers exposed on to job to dusts, fumes, vapors, chemicals, or radiation.

[b] Hammond, et al. 1979.

(excluding esophagus) in 2271 deaths of insulation workers. Were smoking-related lung cancer not a factor, abdominal cancer deaths would dominate the mortality experience of this group of asbestos workers.

Other studies have substantiated the synergistic effect of cigarette smoking. Berry, et al. (1972) obtained retrospective smoking histories on a group of asbestos workers and analyzed their mortality according to smoking habits over a ten year period of time. The results indicated that the combined effect of cigarette smoking and asbestos exposure on the development of lung cancer is multiplicative rather than additive.

Although synergistic effects have been documented for bronchogenic carcinoma, only cigarette smoking has been investigated in the etiology of abdominal cancers. The possibility exists, of course, that these tumors too could have a multiple factor etiology and that other contaminants, ingested with asbestos, may potentiate tumor development.

Additionally, some non-malignant asbestos effects are related synergistically to cigarette smoking. Among a group of factory employees it was found by Weiss (1971) that evidence of fibrosis, as manifest on x-rays, was increased among individuals who smoked cigarettes compared to non-smokers. Deaths due to asbestosis appear also to be increased in cigarette smokers compared to non-smokers (Hammond, et al. 1979).

In animal experiments, exposure to benzo(a)pyrene (BP) and asbestos may act synergistically. Pylev and Shabad

(1973) reported that intratracheal injections of 6 mg of chrysotile onto which was absorbed 0.144 mg of BP (from a benzene suspension) and 2 mg of chrysotile co-administered with 5 mg BP produced malignant tumors in 29 percent and 54 percent of rats, respectively. Administration of 6 mg of chrysolite or 5 mg BP yielded no tumors. Miller, et al. (1965) found intratracheal injection of chrysolite with BP to increase tumor yield over that of BP alone while amosite appeared to have little such effect.

No data exist on antagonistic or prophylatic compounds in relation to animal or human disease. In vitro experiments by Schnitzer, (1974) have shown that hemolysis of red cells can be inhibited by coating the fibers with ionic polymers such as carboxymethylcellulose.

CRITERION FORMULATION

Existing Guidelines and Standards

The current Occupational Safety and Health Administration (OSHA) standard for an eight-hour time-weighted average (TWA) occupational exposure to asbestos is 2 fibers longer than 5 microns in length per milliliter of air (2 f/ml or 2,000,000 f/m^3). Peak exposures of up to 10 f/ml are permitted for no more than ten minutes (Fed. Reg., 1972). This standard has been in effect since July 1, 1976, when it replaced an earlier one of 5 f/ml (TWA). In Great Britain, too, a value of 2 f/ml is the accepted level, below which no controls are required (BOHS, 1968); the British standard, in fact, served as a guide for the OSHA standard (NIOSH, 1972).

The British standard was developed specifically to prevent asbestosis among working populations; data were felt to be lacking that would allow a determination of a standard for cancer(BOHS, 1968). Unfortunately, among occupational groups, cancer is the primary cause of excess death among workers (see "Carcinogenicity" section). Three-fourths or more of asbestos-related deaths are from malignancy. This fact has led OSHA to propose a lower TWA standard of 0.5 f/ml (500,000 f/m^3) (Fed. Reg., 1975). The National Institute for Occupational Safety and Health (NIOSH), in their criteria document for the hearings on a new standard, have proposed a value of 0.1 f/ml (NIOSH, 1976). In the discussion of the NIOSH proposal, it was stated that the value was selected on the basis of the sensitivity of analytical techniques using optical microscopy and that 0.1 f/ml may not necessarily protect against cancer. Recognition that no information exists that would define a threshold for asbestos carcinogenesis was also contained in the preamble to the OSHA proposal. The existing standard in Great Britain has also been called into question by Peto (1978), who estimates that asbestos disease may cause the death of ten percent of workers exposed at 2 f/ml for a working lifetime.

The existing federal standard for asbestos emissions into the environment prohibits "visible emissions" (U.S. EPA, 1975). No numerical value was specified because of difficulty in monitoring ambient air asbestos concentrations in the ambient air or in stack emissions. (Time-consuming and expensive electron microscopy is often required.) Some local government agencies, however, may have numerical standards (New York, 27 ng/m^3 for example).

No standards for asbestos in foods or beverages exist even though the use of filtration of such products through asbestos filters has been a common practice in past years. Asbestos filtration, however, is prohibited or limited for human drugs (FDA, 1976).

Current Levels of Exposure

As detailed in the "Exposure" section, asbestos is a ubiquitous contaminant of our air and water. Air concentrations over 24 hours in metropolitan areas usually are less than 5 ng/m^3 but can range up to 20 ng/m^3. Values up to 50 ng/m^3 are found during daytime hours in locations where construction activities and traffic can be contributing sources. A significant fraction of the fibers inhaled can be brought up from the respiratory tract and swallowed. This leads to an ingestion exposure from air sources of up to 0.1 µg/day, although most of the population exposure is from 0.02 to 0.05 µg/day.

Water concentrations of asbestos are usually less than 10^6 fibers of all sizes per liter although significantly higher values (10^8 f/l) have been found in circumstances where water systems have been in contact with asbestiform minerals or where contamination of the water supply exists. Fiber mass concentrations corresponding to fiber concentrations are usually less than 0.01 µg/liter but could exceed 1 µg/l. Thus, direct water ingestion usually leads to exposures of less than 0.02 µg/day.

Clearly, point source pollution can cause both air and water concentrations to exceed the above values. Such instances are discussed in the "Exposure" section.

Special Groups at Risk

Special groups at risk may include neonates and children; however, no data exist on the relative sensitivity to asbestos of infants and children undergoing rapid growth. Concern exists because fibers deposited in the tissues of the young may have an extremely long residence time during which malignant changes could occur. In addition, risk could be influenced by differential absorption rates which have not been fully studied at this time.

Individuals on kidney dialysis machines may also be at greater risk as fluids, potentially contaminated with asbestos fibers, can enter the blood stream directly or, in selected instances, the peritoneal cavity (peritoneal dialysis).

Although no synergistic effects have been identified in the etiology of asbestos-related gastrointestinal cancer, they cannot be ruled out. Thus, people exposed to other carcinogens, initiators, or promotors could be at increased risk.

An increased risk is also associated with increased exposure to asbestos in water in municipalities such as San Francisco or Seattle where asbestos occurs naturally in water, in cities where there is an interaction between aggressive water and asbestos-cement pipe, or in cities whose water may be contaminated as a result of asbestos operations. Also, the use of asbestos cement products for the collection of water, such as in cisterns in the Virgin Islands or in roof run-offs in tropical areas, increases exposure.

Basis and Derivation of Criterion

A substantial body of data exists which shows increased incidence of cancer of the esophagus, stomach, colon, and rectum or peritoneal mesothelioma in humans exposed to asbestos occupationally. For several of these groups, data exist on the approximate air-borne fiber concentrations to which individuals were exposed (see "Effects" section). These human data will serve as the primary basis for a standard of asbestos in water. Experimental data ("Pharmacokinetics" section) indicate that a major fraction of the asbestos deposited in the lungs is subsequently swallowed. In this section the dose to the gastrointestinal tract of four occupational groups will be calculated from knowledge of the air concentrations to which the workers were exposed and follow the assumption that all the asbestos inhaled subsequently passed through the gastrointestinal tract and provided the exposure that led to the observed increase in abdominal cancer. The assumption that all inhaled asbestos is ingested is an overestimate but not significantly. No account has been taken of the material that a worker may swallow directly, and this quantity could be significant. However, for the purposes of a criterion, our inability to quantitate direct ingestion in the work place and to properly account for it by the present approach provides some margin of safety in the estimate of dose-response relations.

Table 30 lists the percentage of death from excess gastrointestinal cancer and peritoneal mesothelioma in four groups of asbestos workers. Calculations of this percentage were made using expected numbers of death, rather than the observed, because the latter was inflated by including other asbestos-related deaths.

Table 31 lists the fiber concentration estimates (see "Carcinogenicity" section) and an exposure index for each cohort (years of exposure x fiber concentration). This index will be used to calculate the number and mass of asbestos fibers ingested during a working lifetime. As the observed mortality is, to a large extent, after 20 years from first exposure, the intermixing of time and exposure does not present significant problems.

TABLE 30

Percentage of Excess Gastrointestinal Cancers and Peritoneal Mesothelionias in Four Groups of Asbestos Workers

Exposed group	Number of Excess Deaths (from Table 28)		Expected Number of deaths in cohort	Excess deaths as a percentage of expected deaths in cohort		
	G.I. cancer	Peritoneal mesothelioma		GI	Per. meso.	Total
Insulation workers[a] (chrysotile and amosite)	39.9 (ICD 150-154)[e]	109	1660.96	2.4	6.6	9.0
Insulation workers[b] (chrysotile and amosite)	29.4 (ICD 150-154)	22	305.20	9.6	7.2	16.8
Factory employment[c] (amosite)	10.5 (ICD 150-154)	8	368.62	2.9	2.2	5.1
Factory employment[d] (chrysotile, crocidolite and amosite)	15.8 (ICD 150-154 ex meso)	35	556.0	2.8	6.3	9.1

[a] Selikoff, et al. (1979)

[b] Selikoff, et al. (1976)

[c] Seidman, et al. (1979)

[d] Newhouse and Berry (1979)

[e] Public Health Service (1967-69)

TABLE 31

Exposure Indices for Asbestos Worker Groups

Exposed group	Air fiber concentration (f/ml)	Person-weighted average exposure time (yrs.)	Exposure index (years x f/ml)
U.S. insulators Selikoff, et al. (1979)	15	34	510
NY/NJ insulators Selikoff, et al. (1976)	15	40	600
Amosite factory workers Seidman, et al. (1979)	40	1.9	76
British factory workers Newhouse and Berry (1979)	10-30	See Table 32	180

The average length of exposure for the insulation workers in the first group was calculated from data on employment time at entry into the cohort in 1967. Forty years was used as the working lifetime for the smaller group of New York and New Jersey insulators, virtually all of whom are deceased or retired. The estimate of the person-weighted exposure index for the amosite factory is simply the average employment time multiplied by 40 f/ml. Data from Table 32 were used to estimate a person-weighted exposure index for the Newhouse and Berry group.

$$\text{(Person-weighted exposure index} = \frac{\text{(No. at risk x exposure x time)}}{\text{(No. at risk)}} = 180.)$$

TABLE 32

Exposure Estimates for Workers in a British Factory[a]

Exposure group		No. at risk	Exposure (f/ml)	Time of exposure (years)
Severe	2 years	711	30	20
	2 years	1333	30	2
Low to Moderate	2 years	503	10	20
	2 years	933	10	2

[a] Newhouse and Berry (1979)

A detailed calculation of the daily intake of asbestos to produce a lifetime risk of 10^{-5} is given in Appendix I. Data of the occupational risk of both gastrointestinal cancer and peritoneal mesothelioma were used (Table 30). Account was taken of the fact that occupational exposures took place over a 5-day work week and that the ingestion exposure may encompass a lifespan of 70 years. It was assumed that a worker breathes at the rate of 1 m^3/hr during work exposure for the purpose of calculating total asbestos intake per day. Using a linear dose-response relationship, and a specified risk of 10^{-5}, the calculated 70-year daily intake resulting from these calculations are given in Table 33. The data from Seidman, et al. were not used because it was exclusively from amosite exposures. Assuming that two liters of water are ingested per day, this would correspond to a concentration of 300,000 fibers of all sizes/liter of water.

TABLE 33

Calculated intake for 10^{-5} lifetime Risk of Death from gastrointestinal cancer and peritoneal mesothelioma

Exposure Group	Estimate of intake/day for 10^{-5} risk (fibers of all lengths/day)
Selikoff, et al. (1979)	900,000
Selikoff, et al. (1976)	600,000
Newhouse and Berry, (1979)	400,000
Average	600,000 fibers of all lengths/day

A criterion for a mass concentration of asbestos can also be calculated using the conversion value of 30 $ug/m^3/f/ml$ derived from the data of Table 2 for predominantly chrysotile exposures. A value of 150 $ug/m^3/f/ml$ for amosite appears more appropriate, based on the finding of Davis, et al. (1978) that amosite has approximately a three time greater conversion factor than chrysotile. A detailed calculation is given in Appendix II and the results summarized in Table 34, Assuming that two liters of water are ingested per day, a risk of 10^{-5} would be produced from ingesting water containing 0.05 ug/liter. As mentioned in the "Exposure" section, the variability in the data used to convert optical fiber counts to mass (Factor D in Appendix II) leads to a large uncertainty in the above estimate.

TABLE 34

Calculated Intake for 10^{-5} lifetime Risk of Death from gastrointestinal Cancer and peritoneal mesothelioma

Exposure Group	Estimate of intake/day for 10^{-5} risk (ug/day)
Selikoff, et al. (1979)	0.14
Selikoff, et al. (1976)	0.09
Seidman, et al. (1979)	0.11
Newhouse and Berry, (1979)	0.05
Average	0.1 ug/day

Considering chrysotile and depending on the source of the asbestos in water, 0.05 ug/liter corresponds to from 10^6 to 20×10^6 fibers of all lengths per day. Such estimates are considerably higher than those derived previously and are most likely a reflection of the differences in the sizes of the fibers found in water, as compared to those found in air. Because of these uncertainties, high priority should be given to obtaining accurate size and mass distribution of typical fibers found in different circumstances (air and water) which would allow appropriate conversions to be made between fiber concentrations in air and water.

The majority of samples analyzed for the EPA to date were characterized by a concentration of all microscopic visible fibers per liter of water (See "Exposure" section). Further, techniques for the determination of fiber concentrations (as opposed to mass concentrations) have been published as interim EPA procedures (Anderson and Long, 1978). Thus, a criterion for the concentration of fibers of all sizes in water corresponding to a 10^{-5} risk will be calculated directly from the concentrations of fibers greater than 5 µm measured in the occupational circumstances that produced disease. Unfortunately, the data currently available relating concentrations of fibers longer than 5 µm, counted by optical microscopy, determined by electron microscopy, are extremely limited. These include those by Wallingford (1978), 15:1; Millette (personal communication), 400:1; and Winer and Cossett (1978), 1000:1 and are only for chrysotile asbestos. Using the geometric mean of 200 for this factor from all available data, a total fiber concentration corresponding to a 10^{-5} risk can be calculated from the data of Tables 30 and 31.

In making the calculation, one tacitly assumes the same fiber size distribution in water as in occupational air samples. Some data show that water fiber size distributions vary (Millette, et al. 1979c), and occupational air distributions have been shown to be so variable that the fraction of fibers longer than 5 microns can range over a factor of 10 depending on sampling circumstances (Nicholson, et al. 1972). Although sizing of airborne and waterborne fibers have not been done using the same methods, qualitatively, water appears to have fiber distributions with more smaller fibers than in occupational air samples (Millette, J., personal communication). Thus, an estimate assuming the same fiber size distribution in water as in air will yield a conservative criterion (from the point of view of health).

Although positive animal experiments had various experimental limitations, such data as existed were treated in the model of EPA. The data are presented in Table 35.

TABLE 35

Effect	Estimated 10^{-5} dosage (µg/l)
4/42 Kidney carcinomas 0/49 control	3.2[a]
12/42 Malignancies 2/49 control	1.1

[a] Gibel, et al. (1976)

Considering the large number of experimental uncertainties, these values provide reasonable support for the concentration derived from human exposure data.

This document was concerned with the estimation of that concentration of asbestos in water which will produce a lifetime risk of 1 in 100,000 in a population exposed continuously. The risk estimate was made using a linear extrapolation from existing human data and would appear to constitute a conservative extrapolation. However, in the case of asbestos the risk factor of 1/100,000 is not conservative. If we were concerned with intermittent or localized contamination incidents of some carcinogen that, once identified, could be abated, such a value would have utility. With asbestos, however, we are concerned with a ubiquitous contaminant in the environment to which large populations are continuously exposed for decades. Further, the estimated value has a high degree of uncertainty associated with it, based upon the data from which it was derived.

Under the Consent Decree in NRDC v. Train, criteria are to state "recommended maximum permissible concentrations (including where appropriate, zero) consistent with the protection of aquatic organisms, human health, and recreational activities." Asbestos is suspected of being a human carcinogen. Because there is no recognized safe concentration for a human carcinogen, the recommended concentration of asbestos in water for maximum protection of human health is zero.

Because attaining a zero concentration level may be infeasible in some cases and in order to assist the Agency and States in the possible future development of water quality regulations, the concentrations of asbestos corresponding to several incremental lifetime cancer risk levels have been estimated. A cancer risk level provides an estimate of the additional incidence of cancer that may be expected in an exposed population. A risk of 10^{-5} for example, indicates a probability of one additional case of cancer for every 100,000 people exposed, a risk of 10^{-6} indicates one additional case of cancer for every million people exposed, and so forth.

In the Federal Register notice of availability of draft ambient water quality criteria, EPA stated that it is considering setting criteria at an interim target risk level of 10^{-5}, 10^{-6}, or 10^{-7} as shown in the table below.

Exposure Assumption	Risk Levels and Corresponding Criteria			
	0	10^{-7}	10^{-6}	10^{-5}
2 liters of drinking water		3,000 f/l*	30,000 f/l	300,000 f/l
Consumption of fish and shellfish only.			No Criterion	

*f = fibers

(1) Calculated by applying a modified "one-hit" extrapolation model described in the Methodology Document to the human epidiomological data presented in Appendix III. Since the extrapolation model is linear to low doses, the additional lifetime risk is directly proportional to the water concentration. Therefore, water concentrations corresponding to other risk levels can be derived by multiplying or dividing one of the risk levels and corresponding water concentrations shown in the table by factors such as 10, 100, 1,000, and so forth.

Concentration levels were derived assuming a lifetime exposure to various amounts of asbestos occurring from the consumption of drinking water only.

Although total exposure information for asbestos is discussed and an estimate of the contributions from other sources of exposure can be made, this data will not be factored into ambient water quality criteria formulation until additional analysis can be made. The criteria presented, therefore, assume an incremental risk from ambient water exposure only.

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APPENDIX I

Sample calculation (using Selikoff, et al. (1976) exposure data) of intake in fibers/day corresponding to a risk of 10^{-5} (Linear dose response)

$$\underset{A}{600\ \text{f/ml-yrs}} \times \underset{B}{5/7} \times \underset{C}{200} \times \underset{D}{1/70\ \text{yrs}} \times \underset{E}{10^{6}\ \text{ml/m}^{3}} \times \underset{F}{8\ \text{m}^{3}\text{/day}}$$

$$\times\ \underset{G}{10^{-5}/(16.8 \times 10^{-2})} = 600{,}000 \text{ fibers of all sizes/day}$$

A = Exposure index.

B = Exposure was concentrated in 5 days rather than in 7 days/week.

C = Conversion from optical counts (fibers > 5 μm) to electron microscopic counts (all fibers).

D = 70-year exposure is assumed.

E = Factor for converting ml to m^3.

F = Exposure took place for 8 hours and the worker was assumed to breathe 1 m^3/hour.

G = A risk of 10^{-5} is calculated from data on an observed risk of 16.8×10^{-2}.

[From the study of Selikoff, et al. (1976)]

APPENDIX II

Sample calculation of intake in µg/day corresponding to a risk of 10^{-5} (Linear dose resonse)

$$\underset{A}{600\ \text{f/ml-yrs}} \times \underset{B}{5/7} \times \underset{C}{1/70\ \text{yrs}} \times \underset{D}{\frac{30\ \mu g/m^3}{f/ml}} \times \underset{E}{8\ M^3/\text{day}}$$

$$\times\ 10^{-5}/\underset{F}{(16.8 \times 10^{-2})} = 0.09\ \mu g/\text{day}.$$

A = Exposure index.

B = Exposure was concentrated in 5 days rather than in 7 days/week.

C = 70-year exposure is assumed.

D = Average conversion factor for chrysotile (Table 2).

E = Exposure took place for 8 hrs. and the worker was assumed to breathe 1 m^3/hr.

F = A risk of 10^{-5} is calculated from data on an observed risk of 16.8×10^{-2}.

[From the study of Selikoff, et al. (1976)]

APPENDIX III

Summary and Conclusions Regarding the Carcinogenicity of Asbestos*

Asbestos is a collective mineralogical term referring to naturally occurring minerals which have crystalized in the form of masses of long fibers which can be easily separated. This term also commonly refers to certain mineral occurrences in which fibrous silicate mineral can be extracted and used commercially for insulation, textiles, brake linings, asbestos cement, construction products, etc. Chrysotile, the fibrous form of serpentine, provides over 95 percent of the approximately 900,000 tons of asbestos consumed each year in the United States. The remaining asbestos used consists of the fibrous amphibole minerals crocidolite, amosite (fibrous grunerite) and anthophyllite. Fine dusts produced from the mining, milling, manufacturing, and use of these asbestos minerals contain discreet microscopic, elongated mineral particles or "fibers" which when inhaled by man are known to cause bronchogenic carcinoma and pleural and peritoneal mesothelioma.

Asbestos particles and other inorganic fibers introduced into the pleura, peritoneum and trachea of rodents have induced malignant tumors in numerous studies reported in the literature. Limited and contradictory data exist for the carcinogenicity of asbestos administered to animals by ingestion. One study in which asbestos filter material was fed to rats (Gibel, et al. 1976) reports 12 malignant tumors in 42 exposed animals versus only 2 liver-cell carcinomas in 49 control animals. Electron microscope analysis of animal tissues for asbestos indicates that ingested fibers can accumulate at many sites following hematogenous or lymphatic transport of ingested fibers which pass through the gastrointestinal mucosa.

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*This summary has been prepared and approved by the Carcinogens Assessment Group of EPA on June 23, 1979.

The strongest evidence for the carcinogenicity of ingested asbestos is provided by epidemiology of populations occupationally exposed to high concentrations of airborne asbestos dust. Inhalation exposure to asbestos dust is accompanied by ingestion exposure because high percentage of inhaled fibers are removed from the respiratory tract by mucociliary clearance and swallowed. Peritoneal mesothelioma, often in great excess since it is very rarely observed in the absence of asbestos exposure, and modest excesses of stomach, esophagus, colon-rectum, and kidney cancer have been observed associated with occupational exposure.

The influence of long-term chrysotile fiber contamination of San Francisco Bay area water supplies on cancer incidence has recently been studied by the University of California under an EPA grant. Significant dose-response gradients for the incidence of several cancers, including white male lung and stomach and white female esophageal and peritoneal cancer, were noted independent of the effect of socio-economic status. Other water supply studies are of limited value due to factors such as very low exposure and insufficient time elapsed since initial exposure of the population.

Observation in human urine of mineral fibers previously ingested with drinking water has established that ingested asbestos can pass through the human gastrointestinal mucosa and migrate to various tissues.

Asbestos is a known carcinogen when inhaled. The demonstrated ability of asbestos to induce malignant tumors in different animal tissues, the passage of ingested fibers through the human gastrointestinal mucosa, and the extensive human epidemiological evidence for excess peritoneal, gastrointestinal, and other extrapulmonary cancer as a result of asbestos exposure suggests that asbestos is likely to be a human carcinogen when ingested.

The water quality criterion for asbestos particles is derived from the substantial data which exists for the increased incidence of peritoneal mesothelioma and gastrointestinal tract cancer in humans exposed occupationally to asbestos. This derivation assumes that much or all of this increased disease incidense is caused by fibers ingested following clearance from the respiratory tract. Several studies, including one of 17,800 insulation workers, allow the association of approximate air-borne fiber concentrations to which individuals were exposed with observed excess peritoneal and gastrointestinal cancer. All of the inhaled asbestos is assumed to be eventually cleared from the respiratory tract and ingested.

The water concentration, calculated to keep the individual lifetime cancer risk below 10^{-5}, is 300,000 fibers of all sizes/liter. The corresponding mass concentration for chrysotile asbestos is approximately 0.05 µg/liter.

Derivation of the Water Quality Criterion for Asbestos

The criterion for asbestos particles in water is derived from the substantial data which exists for the increased incidence of peritoneal mesothelioma and gastrointestinal tract cancer in humans exposed occupationally to asbestos. This derivation assumes that much or all of this increased disease incidence is caused by fibers ingested following clearance from the respiratory tract. Several studies, including one of 17,800 isulation workers, allow the association of approximate air-borne fiber concentrations to which individuals were exposed with observed excess peritoneal and gastrointestinal cancer. All of the inhaled asbestos is assumed to be eventually cleared from the respiratory tract and ingested.

Excess deaths due to peritoneal mesothelioma and gastrointrestinal cancer (ICD 150-154) equal approximately 12 per-cent of the expected number of deaths for asbestos workers in three different cohorts studied. An average exposure index of 430 years x fibers >5 μm/ml is calculated for these workers by multiplying average air fiber concentration estimates by average years of exposure time.

Since water measurement for asbestos requires electron microscope analysis for fibers (asbestos particles with length to width ratios ≥ 3.0) of all sizes, the occupational exposure index must be converted from fibers >5 μm (optical microscope) to fibers of all sizes (electron microscope). A ratio of 200 electron microscope identifiable fibers to one optical microscope identifiable fiber is used for chrysotile asbestos in workplace air samples. A much smaller ratio is expected for amphibole fibers.

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Assuming a linear dose response, occupational exposure of 5 days/week and $8m^3$ air inhaled/workday, and 70 years for ingestion of drinking water, the criterion is calculated as follows:

$$\underset{A}{(430\ \ f > 5\ \mu m/ml - \text{years})}\quad \underset{B}{(5/7)}\quad \underset{C}{(200\ f/f > 5\ \mu m)}\quad \underset{D}{(1/70\ \text{years})}$$

$$\underset{E}{(10^6 ml/m^3)}\quad \underset{F}{(8m^3/\text{day})}\quad \underset{G}{(10^{-5}/1.2 \times 10^{-1})}$$

600,000 fibers of all sizes/day

A = Exposure index in years x fibers $> 5\ \mu m/ml$ from Selikoff, et al. (1976, 1979) and Newhouse and Berry (1979)

B = Occupational exposure for 5 days versus 7 days for water exposure

C = Conversion from optical counts ($F > 5 \mu m$) to TEM counts (all fibers) in fibers/fibers $5 \mu m$

D = 70-year exposure is assumed for drinking water

E = Conversion from ml to m^3

F = Occupational exposure for 8 hours while breathing $1m^3/1$ hour

G = A risk of 10^{-5} is calculated from data on an average observed risk of 1.2×10^{-1} from Selikoff, et al. (1976,1979) and Newhouse, Berry (1979)

Based on these parameters and an average ingestion exposure of 2 liters of water per day, the water concentration calculated to keep the individual lifetime cancer risk below 10^{-5} is 300,000 fibers of all sizes/l. The corresponding mass concentration for chrysotile asbestos based on occupational data is approximately 0.05 $\mu g/l$.